

EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

PACIFIC BELL TELEPHONE  
COMPANY,

Movant,

v.

MARINE TAXONOMIC SERVICES,  
LTD,

Respondent.

Case No.: 23-cv-1747-DMS-KSC

**ORDER TRANSFERRING  
RENEWED MOTION TO COMPEL  
COMPLIANCE WITH SUBPOENA  
[DOC. NO. 8] AND  
VACATING ORDER TO SHOW  
CAUSE [DOC. NO 14]**

**I. INTRODUCTION**

Currently pending before the Court is Pacific Bell Telephone Company's ("Pacific Bell") Renewed Motion to Compel Compliance with Subpoena ("Renewed Motion") and Order to Show Cause directed to [third-party] Marine Taxonomic Services, Ltd. ("MTS"). (Doc. Nos. 8, 14). The subpoena for documents and inspection was issued by the U.S. District Court, Eastern District of California, in connection with *California Sportfishing Protection Alliance v. Pacific Bell Telephone Co.*, 21-cv-00073, and was served on MTS on August 10, 2023. Doc. Nos. 8-1, 12.

In a related case before the undersigned, Pacific Bell moved to compel [third-party] Seth Jones to comply with a substantively similar subpoena also issued by the Eastern

District of California in *California Sportfishing Protection Alliance. Pacific Bell Telephone Co. v. Jones*. Doc. No. 2.

Pacific Bell has also filed a Notice of Ruling in the Underlying Litigation, advising that on November 13, 2023, U.S. Magistrate Judge Jeremy D. Peterson of the Eastern District of California “granted in full [Pacific Bell’s] motion to compel . . . third party . . . Below the Blue (“BtB”) to comply with a document subpoena . . . [that] is substantively identical to the subpoena that Pacific Bell seeks to enforce against MTS.” Doc. No. 16 at 2; *see also* Doc. Nos. 16-1 at 2 ¶ 5, 6-7, 20-27. “BtB’s representatives are the same as MTS’s representatives—namely, Mr. Seth Jones is connected to both entities as the CEO of MTS and co-founder of BtB.” Doc. No. 16 at 2.

MTS has filed a Corrected Response to Order to Show Cause and Opposition to Renewed Motion to Compel and Request to Transfer of MTS. Doc. No. 20.

## **II. DISCUSSION**

The court where subpoena compliance is required may “transfer a [subpoena compliance directed] motion . . . to the issuing court if the person subject to the subpoena consents or if the court finds exceptional circumstances.” Fed. R. Civ. P. 45(f). Magistrate judges have the authority to rule on the merits of a subpoena related motion or transfer the case to the issuing court. 28 U.S.C. 636(b)(1)(A); *Agincourt Gaming, LLC v. Zynga, Inc.*, No. 14-CV-0708-RFB-NJK, 2014 WL 4079555, at \*1–2 (D. Nev. Aug. 15, 2014).

Pacific Bell’s Renewed Motion is appropriate for transfer to the Eastern District because “MTS requests . . . this matter be transferred to the Eastern District of California . . . so that . . . Court . . . can make a unified set of rulings on issues presented by . . . identical subpoenas” served on MTS, BtB, and Mr. Jones. Doc. No. 20 at 2-3.

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**III. CONCLUSION**

Based on the foregoing, the Court directs the Clerk of the Court to transfer the Renewed Motion to the Eastern District of California and terminate this case. The Order to Show Cause Directed to MTS is vacated. Doc. No. 14

**IT IS SO ORDERED.**

Dated: December 21, 2023

A handwritten signature in black ink, appearing to read 'Karen S. Crawford', written over a horizontal line.

Hon. Karen S. Crawford  
United States Magistrate Judge

EXHIBIT B



**Alvarez & Marsal Disputes and Investigations, LLC**  
540 West Madison Street, Suite 1800  
Chicago, IL 60661  
Telephone: 312-601-4220  
Fax: (312) 332-4599

February 27, 2024

Joshua Koltun, Attorney  
One Sansome Street  
Suite 3500, No. 500  
San Francisco, CA 94104

Invoice Reference #: 851207-240216000238  
Marine Taxonomic Services

Dear Mr. Koltun:

Please find attached Alvarez & Marsal's invoice for Professional Fees rendered to Marine Taxonomic Services, Ltd. in relation to the non-party subpoena related to the California Sportfishing Protection Alliance v. Pacific Bell Telephone Companies matter. This invoice covers the period 01/05/2024 through 01/31/2024.

Please let me know if you have any questions regarding this invoice. We appreciate the opportunity to be of service to you.

Sincerely,

Kevin Negangard  
Managing Director



**Alvarez & Marsal Disputes and Investigations, LLC**  
 540 West Madison Street, Suite 1800  
 Chicago, IL 60661  
 Telephone: 312-601-4220  
 Fax: (312) 332-4599

February 27, 2024

**Reference Invoice #:**

**851207-240216000238**

Joshua Koltun, Attorney  
 One Sansome Street  
 Suite 3500, No. 500  
 San Francisco, CA 94104

Invoice Reference #: 851207-240216000238  
 Marine Taxonomic Services

Professional Fees Rendered 01/05/2024 - 01/31/2024	\$	90,597.50
Admin Fee (4% of Professional Fees)	\$	3,623.90
Travel Expenses for Onsite Meetings and Forensic Data Collection	\$	1,067.95
Encrypted Electronic Media and Shipping Expenses	\$	1,497.64
Relativity User Fee - 3 Users - January 2024 (\$150/User)	\$	450.00
Secure Technology Infrastructure Fee (January 2024)	\$	1,500.00
Total Amount Due	\$	<u>98,736.99</u>

**Wire Instructions:**

Bank: Wells Fargo  
 ABA: 121000248  
 Swift: WFBUIUS6S  
 IBAN:  
 Account Name: Alvarez & Marsal Disputes And Investigations LLC  
 Account Number: 2000018590539  
 Reference Invoice #: 851207-240216000238  
 Notification Email: treasury@alvarezandmarsal.com

**For security purposes, all bank account changes should be verbally verified by contacting A&M using a known telephone number BEFORE funds are sent to a different account.**

**Mail Instructions:**

Alvarez & Marsal Disputes and Investigations, LLC  
 Attn: Liz Carrington  
 600 Madison Avenue  
 8th Floor  
 New York, NY 10022



**Alvarez & Marsal Disputes and Investigations, LLC**  
 540 West Madison Street, Suite 1800  
 Chicago, IL 60661  
 Telephone: 312-601-4220  
 Fax: (312) 332-4599

February 27, 2024

**Reference Invoice #:**

851207-240216000238

Joshua Koltun, Attorney  
 One Sansome Street  
 Suite 3500, No. 500  
 San Francisco, CA 94104

Marine Taxonomic Services

Summary of Fees 01/05/2024 - 01/31/2024					
Date	Name	Description	Hours	Rate	Amount
1/5/2024	Oza, Vishal	Correspondence with Counsel regarding the data collection, analysis, and production protocol. Prepare draft workplan for Counsel regarding the recommended data preservation approach.	1.30	675.00	877.50
1/8/2024	Gomerez, Ana	Meeting with project team to finalize the workplan associated with the search and preservation of cloud accounts identified by Counsel.	0.60	300.00	180.00
1/8/2024	Oza, Vishal	Meeting with Counsel and the identified custodians to finalize the data preservation, search analysis, and production workplan.	0.80	675.00	540.00
1/8/2024	Gomerez, Ana	Prepare data collection summary, chain of custody, and associated documentation related to the forensic data collection and preservation initiatives.	1.00	300.00	300.00
1/8/2024	Gomerez, Ana	Document and verify the collection process of laptop and tablet data identified by Counsel. Perform the preservation of subsequent custodian accounts identified by Counsel.	1.00	300.00	300.00
1/8/2024	Oza, Vishal	Perform on-site data collection of multiple mobile device and custodian data sources identified by Counsel.	2.50	675.00	1,687.50
1/8/2024	Oza, Vishal	Coordination with Counsel to perform the data preservation of email and cloud data sources identified by Counsel.	2.50	675.00	1,687.50
1/8/2024	Gomerez, Ana	Perform validation of custodian data sets identified for preservation by Counsel. Prepare extraction for metadata analysis and keyword search application.	2.90	300.00	870.00
1/8/2024	Gomerez, Ana	Perform forensic collection of custodian devices and data from corporate cloud platform to include the revised custodian accounts.	2.90	300.00	870.00
1/8/2024	Oza, Vishal	Perform on-site data collection and analysis of multiple custodian devices at the direction of Counsel. Attend meeting with custodian to discuss the data sources identified by Counsel.	2.90	675.00	1,957.50
1/9/2024	Gomerez, Ana	Prepare revisions to the evidence tracking system to include media details of additional custodian data sets identified for preservation and analysis.	1.00	300.00	300.00
1/9/2024	Gomerez, Ana	Perform data collection and analysis of corporate devices per Counsel discussion. Prepare extraction of content for keyword search application and Counsel review.	1.20	300.00	360.00
1/9/2024	Michalek, Joe	Perform the forensic collection of custodian mailbox data per Counsel request. Initiate the export generation for completed content searches.	1.40	450.00	630.00
1/9/2024	Oza, Vishal	Perform image verification and backups of collected forensic images; initiate processes for data extractions.	1.50	675.00	1,012.50
1/9/2024	Michalek, Joe	Prepare search analysis within the corporate email platform to identify email categories identified by Counsel.	1.80	450.00	810.00
1/9/2024	Oza, Vishal	Perform on-site data collection of mobile device and custodian media identified by Counsel.	2.20	675.00	1,485.00
1/9/2024	Oza, Vishal	Prepare data preservation approach for custodian laptop device. Discussion with Counsel regarding the associated initiatives.	2.50	675.00	1,687.50
1/9/2024	Oza, Vishal	Perform on-site data collection of additional devices and custodian accounts identified by Counsel.	2.80	675.00	1,890.00
1/9/2024	Gomerez, Ana	Document and verify the collection process of laptop and tablet data while on-site; include subsequent custodian accounts identified by Counsel.	2.90	300.00	870.00



Date	Name	Description	Hours	Rate	Amount
1/9/2024	Gomerez, Ana	Perform the forensic data collection of custodian devices identified by Counsel. Coordination with custodian to obtain access to the device and accounts identified for preservation by Counsel.	2.90	300.00	870.00
1/10/2024	Michalek, Joe	Teleconference with project team to finalize the data collection and documentation procedures related to the data sources identified by Counsel.	0.60	450.00	270.00
1/10/2024	Negangard, Kevin	Review proposed declaration provided by Counsel. Prepare initial comments.	0.60	850.00	510.00
1/10/2024	Michalek, Joe	Perform transfer of completed exports and prepare extraction for keyword search application and Counsel review.	0.70	450.00	315.00
1/10/2024	Michalek, Joe	Perform download of completed Email exports and prepare associated documentation.	0.90	450.00	405.00
1/10/2024	Michalek, Joe	Correspondence with Counsel to identify relevant cloud data links and confirm collection protocol.	0.90	450.00	405.00
1/10/2024	Gomerez, Ana	Prepare revisions to the evidence tracking system to include media details of additional custodian data sets identified for preservation and analysis.	1.00	300.00	300.00
1/10/2024	Gomerez, Ana	Update the project documentation archives to reflect the recent data collection and data extractions.	1.00	300.00	300.00
1/10/2024	Gomerez, Ana	Perform forensic image verification, chain of custody documentation, and revisions to the evidence inventory system.	1.00	300.00	300.00
1/10/2024	Oza, Vishal	Perform image verification, chain of custody and add it to evidence inventory system.	1.30	675.00	877.50
1/10/2024	Michalek, Joe	Perform transfer of completed exports and prepare associated documentation.	1.40	450.00	630.00
1/10/2024	Oza, Vishal	Perform forensic imaging of laptop device(s) and external hard drive provided by Client.	1.80	675.00	1,215.00
1/10/2024	Oza, Vishal	Prepare initial analysis of data types from forensic images; perform data extractions and conference with Counsel about the same.	2.50	675.00	1,687.50
1/11/2024	Suri, Saira	Teleconference with project team to discuss the discovery initiatives and matter background.	0.30	350.00	105.00
1/11/2024	Buehre, Emily	Teleconference with project team to discuss data export process. Provide recommendations regarding the conversion and extraction approach.	0.40	450.00	180.00
1/11/2024	Gomerez, Ana	Perform analysis of forensic image and perform validation to confirm the preservation and review process. Prepare summary report for Counsel review.	1.00	300.00	300.00
1/11/2024	Gomerez, Ana	Update the project documentation archives to reflect the recent data collection and data extractions. Prepare summary for Counsel review.	1.00	300.00	300.00
1/11/2024	Oza, Vishal	Collaborate with project team on remote data collections and prepare an update for the Client.	1.20	675.00	810.00
1/11/2024	Oza, Vishal	Call with Counsel to discuss various updates and work on declaration.	1.50	675.00	1,012.50
1/11/2024	Michalek, Joe	Perform the forensic collection of custodian mailbox data per Counsel request. Initiate the export generation for completed content searches.	1.70	450.00	765.00
1/12/2024	Oza, Vishal	Teleconference with project team regarding data extractions and processing.	0.30	675.00	202.50
1/12/2024	Oza, Vishal	Review of keywords and various Client communications.	0.80	675.00	540.00
1/12/2024	Gomerez, Ana	Prepare updates to the evidence tracking system to include media details of additional custodian data sets identified for preservation and analysis.	1.10	300.00	330.00
1/12/2024	Gomerez, Ana	Prepare inventory and analysis of custodian preservation media to confirm contents. Complete the data extraction and metadata analysis prior to keyword search and Counsel review.	1.40	300.00	420.00
1/12/2024	Gomerez, Ana	Prepare subsequent custodian datasets for forensic preservation and extraction per Counsel request. Update evidence tracking system to include evidence details.	1.90	300.00	570.00
1/12/2024	Gomerez, Ana	Prepare revised custodian collection datasets for search term application and Counsel review prior to production. Perform revisions to the evidence tracking system to include evidence details.	2.00	300.00	600.00
1/13/2024	McLaughlin, Blake	Perform initial collection assessment and configuration for data extraction in advance of search term application and Counsel review. Conduct assessments in processing newly received data.	0.50	300.00	150.00
1/16/2024	Suri, Saira	Teleconference with project team to discuss privilege searching efforts and recommended approach for Counsel review.	0.20	350.00	70.00
1/16/2024	Negangard, Kevin	Correspondence with Counsel regarding the custodian data preservation, analysis, and review initiatives.	0.30	850.00	255.00
1/16/2024	McKenzie, Jimmy	Coordination with project team in finalizing the custodian email data sets for search analysis and review.	0.40	550.00	220.00

Date	Name	Description	Hours	Rate	Amount
1/16/2024	Suri, Saira	Teleconference with Counsel to discuss the project background and discovery initiatives.	0.50	350.00	175.00
1/16/2024	Oza, Vishal	Teleconference with Counsel to discussion the project initiatives and review approach.	0.50	675.00	337.50
1/16/2024	Suri, Saira	Perform analysis of search terms for syntax and extract privilege terms to generate separate lists.	0.80	350.00	280.00
1/16/2024	Suri, Saira	Teleconference with project team to discuss the initial preparation of review platform and analysis of search terms received from Counsel.	0.90	350.00	315.00
1/16/2024	McKenzie, Jimmy	Teleconference with project team to discuss the initial project workplan, preparation of review platform for searching, and analysis of search terms received from Counsel.	0.90	550.00	495.00
1/16/2024	Oza, Vishal	Teleconference with project team to discuss project initialization and case background.	0.90	675.00	607.50
1/17/2024	Suri, Saira	Perform review of file path directory provided by Counsel. Prepare summary for Counsel comments.	0.20	350.00	70.00
1/17/2024	Michalek, Joe	Teleconference with project team to discuss extraction status and data filtering protocol.	0.30	450.00	135.00
1/17/2024	Negangard, Kevin	Correspondence with project team regarding the revised custodian data preservation and analysis workplan. Provide comments to Counsel regarding the recommended approach.	0.60	850.00	510.00
1/17/2024	Suri, Saira	Teleconference with project team and Counsel to discuss project status and review protocol.	0.80	350.00	280.00
1/17/2024	Michalek, Joe	Teleconference with project team and Counsel to discuss the discovery initiatives, review protocol, and production.	0.80	450.00	360.00
1/17/2024	Oza, Vishal	Teleconference with project team and Client to discuss project status, review protocol, and next-steps.	0.80	675.00	540.00
1/18/2024	McLaughlin, Blake	Perform initial custodian data collection assessment and configuration for data extraction. Conduct assessments of contents and prepare extraction for search term application and Counsel review.	1.50	300.00	450.00
1/18/2024	McLaughlin, Blake	Analysis of extraction discrepancies followed by verification protocols. Prepare comprehensive reports detailing data volumes processed.	1.50	300.00	450.00
1/19/2024	Suri, Saira	Prepare subsequent custodian media set for search term application and Counsel review.	0.20	350.00	70.00
1/19/2024	McKenzie, Jimmy	Coordinate with project team in finalizing search term reporting and addressing Counsel inquiries regarding the initial results.	0.20	550.00	110.00
1/19/2024	Negangard, Kevin	Correspondence with project team regarding the revised custodian data preservation and analysis workplan. Provide comments to Counsel regarding the recommended approach.	0.30	850.00	255.00
1/19/2024	Negangard, Kevin	Correspondence with Counsel regarding the custodian data preservation, analysis, and review initiatives.	0.40	850.00	340.00
1/19/2024	Suri, Saira	Prepare revisions to the document review workspace in anticipation of Counsel review. Finalize the associated review groups requested by Counsel.	0.60	350.00	210.00
1/19/2024	Suri, Saira	Finalize the initial review workflow, prepare coding panel, and review sets for Counsel.	0.70	350.00	245.00
1/19/2024	Suri, Saira	Teleconference with project team and Counsel to discuss the review protocol and false positive analysis initiatives.	1.00	350.00	350.00
1/19/2024	Michalek, Joe	Teleconference with project team and Counsel to discuss review protocol and recommended approach for false positive analysis.	1.00	450.00	450.00
1/19/2024	Oza, Vishal	Meeting with Counsel regarding the data analysis, search category identification, and production initiatives.	1.30	675.00	877.50
1/19/2024	Suri, Saira	Prepare analysis of responsive and privilege search terms across initial email and mobile data. Prepare summary report and provide results to Counsel. Discussion with Counsel regarding the initial results.	1.70	350.00	595.00
1/19/2024	Nagle, Tyler	Perform validation of additional custodian data source. Prepare for custodian data set extraction and keyword search application per Counsel specifications.	1.90	300.00	570.00
1/20/2024	McKenzie, Jimmy	Collaborate with Counsel on drafting responses to Counsel in preparation for document review.	0.20	550.00	110.00
1/20/2024	Suri, Saira	Review revisions from Counsel regarding privilege and responsive searching and draft communication with summary and feedback.	0.90	350.00	315.00
1/20/2024	Suri, Saira	Implement modifications to scope of privilege and responsive search analysis and prepare revised summary report for Counsel.	1.30	350.00	455.00
1/21/2024	McKenzie, Jimmy	Coordinate with project team to review correspondence with Counsel in preparing newly requested search term reports. Finalize search and exclusion logic. Assist in finalizing reports and delivery to Counsel for review.	0.60	550.00	330.00

Date	Name	Description	Hours	Rate	Amount
1/21/2024	Oza, Vishal	Coordinate with project team on outstanding collections with data processing status into review platform; various Client communications.	0.80	675.00	540.00
1/21/2024	Suri, Saira	Collaborate with project team to finalize revised searching and draft communication to Counsel.	1.40	350.00	490.00
1/22/2024	Suri, Saira	Revise scope of privilege search and provided updated results and report to Counsel.	0.30	350.00	105.00
1/22/2024	Suri, Saira	Address inquiries from Counsel regarding the current search and analysis approach.	0.40	350.00	140.00
1/22/2024	McKenzie, Jimmy	Collaborate with project team to address inquiries and updated items from Counsel to prepare new search term reports.	0.40	550.00	220.00
1/22/2024	McLaughlin, Blake	Update evidence handling and chain of custody management for subsequent data collection initiatives. Coordinate with project team to finalize tracking materials.	0.50	300.00	150.00
1/22/2024	Suri, Saira	Teleconference with Counsel and project team to provide update on data collection initiatives and to discuss ongoing search analysis approach.	0.50	350.00	175.00
1/22/2024	Suri, Saira	Revise scope of privilege and responsive searching to exclude additional non-responsive term hits and provide updated results and term reports.	0.60	350.00	210.00
1/22/2024	Michalek, Joe	Teleconference with Counsel to discuss forensic data collection initiatives and revisions to the discovery workplan.	0.60	450.00	270.00
1/22/2024	Suri, Saira	Prepare revised scope of privilege search analysis and provide revised results and term report to Counsel.	0.70	350.00	245.00
1/22/2024	Nagle, Tyler	Prepare inventory of custodian data sources and evidence items to prepare for the metadata extraction and keyword search initiatives.	0.90	300.00	270.00
1/22/2024	Michalek, Joe	Perform laptop data extractions of identified content per Counsel discussion. Prepare document set for Counsel review.	0.90	450.00	405.00
1/22/2024	Oza, Vishal	Coordinate with project team on outstanding collections with data processing status into review platform; various Client communications.	1.10	675.00	742.50
1/22/2024	Michalek, Joe	Develop specialized data categories for laptop extractions based on feedback provided by Counsel regarding relevant data types and file extensions.	1.80	450.00	810.00
1/22/2024	Michalek, Joe	Perform the forensic collection of custodian mailbox data per Counsel request. Initiate the transfer for completed content searches.	1.90	450.00	855.00
1/22/2024	McLaughlin, Blake	Proceed with evaluating the collection and set up parameters for data processing. Perform evaluations as data received is processed into review application.	2.00	300.00	600.00
1/22/2024	McLaughlin, Blake	Examine processing errors and discrepancies, adhering to quality assurance procedures. Generating detailed reports regarding received data.	2.00	300.00	600.00
1/23/2024	Suri, Saira	Prepare revised privilege search categories at the request of Counsel.	0.20	350.00	70.00
1/23/2024	Suri, Saira	Teleconference with project team to review and finalize multiple custodian data sets into review platform and prepare for searching.	0.40	350.00	140.00
1/23/2024	McKenzie, Jimmy	Teleconference with project team to review and finalize multiple custodian data sets within the review platform and prepare for search analysis.	0.40	550.00	220.00
1/23/2024	McKenzie, Jimmy	Collaborate with project team in preparing the subsequent document review scopes in coordination with Counsel. Prepare new logic for additional workflows in building out document review.	0.40	550.00	220.00
1/23/2024	Negangard, Kevin	Review the revised custodian data preservation and analysis workplan. Review correspondence with Counsel regarding the revised workplan initiatives.	0.40	850.00	340.00
1/23/2024	Suri, Saira	Teleconference with project team to discuss overall review searching methodology and workflow to prepare updated search term reports requested by Counsel.	0.50	350.00	175.00
1/23/2024	McKenzie, Jimmy	Teleconference with project team to discuss overall review searching methodology and workflow to prepare updated search term reports requested by Counsel.	0.50	550.00	275.00
1/23/2024	McLaughlin, Blake	Prepare inventory and chain of custody records of custodian data sets. Prepare custodian document sets for keyword search application and Counsel review.	1.00	300.00	300.00
1/23/2024	Oza, Vishal	Meeting with Counsel and project team regarding the data analysis, search category identification, and production initiatives.	1.00	675.00	675.00
1/23/2024	Suri, Saira	Finalize the privilege and responsive search analysis and prepare summary for Counsel review. Discussion with Counsel regarding the revised results.	1.40	350.00	490.00

Date	Name	Description	Hours	Rate	Amount
1/23/2024	Suri, Saira	Coordinate with Counsel to revise responsive and privilege searching. Draft communication and address follow up inquiries.	1.60	350.00	560.00
1/23/2024	McLaughlin, Blake	Conduct assessments of custodian media contents and prepare extraction for search term application and Counsel review.	2.00	300.00	600.00
1/23/2024	McLaughlin, Blake	Prepare inventory and chain of custody records of custodian data sets. Prepare custodian document sets for keyword search application and Counsel review.	2.00	300.00	600.00
1/24/2024	Stecke, Curtis	Review contents of custodian cloud data set to confirm contents and applicable date range. Perform metadata extraction to prepare for keyword search application and Counsel review.	0.40	450.00	180.00
1/24/2024	Negangard, Kevin	Correspondence with project team to review the ESI review and production initiatives.	0.60	850.00	510.00
1/24/2024	Stecke, Curtis	Prepare extraction and metadata review of custodian mailbox extraction per Counsel request.	1.10	450.00	495.00
1/24/2024	Michalek, Joe	Perform laptop data extractions of identified content per Counsel discussion. Prepare document set for Counsel review.	1.20	450.00	540.00
1/24/2024	McLaughlin, Blake	Teleconference with project team to discuss the data analysis initiatives. Prepare metadata extraction for Counsel review and search term application.	1.90	300.00	570.00
1/24/2024	McLaughlin, Blake	Perform metadata extraction of additional custodian data sets. Prepare review workspace for Counsel review.	2.00	300.00	600.00
1/24/2024	McLaughlin, Blake	Review of custodian mailbox extractions to confirm the contents and applicable date ranges. Prepare metadata extraction for Counsel review and search term application.	2.00	300.00	600.00
1/25/2024	Stecke, Curtis	Conduct systematic and ongoing assessments of newly received data, employing a dynamic and iterative approach to evaluate and scrutinize the information as it is acquired.	0.60	450.00	270.00
1/25/2024	Negangard, Kevin	Prepare comments regarding the revised custodian data preservation, review, and production workplan. Review correspondence with Counsel regarding the revised workplan initiatives.	0.60	850.00	510.00
1/25/2024	Michalek, Joe	Perform laptop data extractions of identified content per Counsel discussion. Prepare document set for Counsel review.	1.10	450.00	495.00
1/25/2024	Stecke, Curtis	Perform metadata extraction of custodian data source to prepare for keyword search application and Counsel review.	1.60	450.00	720.00
1/26/2024	Negangard, Kevin	Correspondence with project team regarding the ESI review, analysis, and production initiatives.	0.40	850.00	340.00
1/26/2024	Suri, Saira	Implement revised date limitation on responsive searching and prepare updated search term summary for Counsel review.	0.70	350.00	245.00
1/26/2024	Stecke, Curtis	Prepare summary reporting to reflect current status of custodian device data collections for review by Counsel. Prepare resulting data sets for extraction.	0.70	450.00	315.00
1/26/2024	Suri, Saira	Prepare revised date limitation on responsive search terms and prepare updated search term report for Counsel.	0.80	350.00	280.00
1/26/2024	Michalek, Joe	Perform laptop data extractions of identified content per Counsel discussion. Prepare document set for Counsel review.	1.30	450.00	585.00
1/26/2024	Suri, Saira	Coordinate with Counsel to prepare file path analysis to scope responsive documents within identified folders. Prepare related searches for review.	1.40	350.00	490.00
1/26/2024	Stecke, Curtis	Perform metadata extraction of identified custodian media to prepare for keyword search application and Counsel review.	1.40	450.00	630.00
1/27/2024	Michalek, Joe	Perform laptop data extractions of identified content per Counsel discussion. Prepare document set for Counsel review.	0.40	450.00	180.00
1/27/2024	Suri, Saira	Address queries from Counsel regarding the search analysis and review approach.	0.50	350.00	175.00
1/27/2024	Stecke, Curtis	Prepare updates to the data preservation and documentation reports. Discussion with project team regarding the current data collection initiatives.	0.80	450.00	360.00
1/27/2024	Stecke, Curtis	Perform metadata extraction of additional custodian data set prior to keyword search application and Counsel review. Prepare custodian cloud data for analysis within the review workspace.	1.90	450.00	855.00
1/28/2024	Michalek, Joe	Perform laptop data extractions of identified content per Counsel discussion. Prepare document set for Counsel review.	0.50	450.00	225.00
1/29/2024	Suri, Saira	Prepare response to review team regarding the document review initiatives.	0.10	350.00	35.00
1/29/2024	Suri, Saira	Prepare response to Counsel regarding the non-responsive and secondary set of search terms.	0.30	350.00	105.00
1/29/2024	McKenzie, Jimmy	Collaborate with project team in gather feedback to respond to multiple Counsel inquiries regarding the search analysis initiatives.	0.30	550.00	165.00
1/29/2024	Suri, Saira	Teleconference with project team to review the remaining custodian data collection and export initiatives in preparation for searching in review platform.	0.40	350.00	140.00

Date	Name	Description	Hours	Rate	Amount
1/29/2024	Michalek, Joe	Teleconference with project team to discuss the discovery initiatives and remaining data collection initiatives in preparation for searching within the review platform.	0.40	450.00	180.00
1/29/2024	McKenzie, Jimmy	Teleconference with project team to discuss current data extraction and remaining collections in preparation for searching in review platform.	0.40	550.00	220.00
1/29/2024	Negangard, Kevin	Correspondence with project team regarding the expedited review and production initiatives. Prepare draft workplan for Counsel discussion.	0.40	850.00	340.00
1/29/2024	Suri, Saira	Teleconference with project team and Counsel to discuss the review workflow and production initiatives.	0.50	350.00	175.00
1/29/2024	Oza, Vishal	Call with Counsel to discuss the ESI protocol and production initiatives.	0.50	675.00	337.50
1/29/2024	Stecke, Curtis	Perform metadata extraction of identified custodian Cloud media to prepare for keyword search application and Counsel review.	0.60	450.00	270.00
1/29/2024	Michalek, Joe	Prepare inventory of collected data sets and schedule additional meetings with custodians to perform the data preservation identified by Counsel.	0.60	450.00	270.00
1/29/2024	McKenzie, Jimmy	Teleconference with project team to discuss ongoing and outstanding collections and data extraction status within the review platform for Counsel review.	0.60	550.00	330.00
1/29/2024	Suri, Saira	Execute secondary set of terms against email and mobile data. Prepare comparative report with original set of terms for Counsel review.	1.60	350.00	560.00
1/29/2024	McLaughlin, Blake	Perform metadata extraction of additional custodian data sets identified for Counsel review. Prepare revisions to the review workspace for Counsel review.	1.90	300.00	570.00
1/29/2024	McLaughlin, Blake	Conduct analysis across collected mail stores and perform required remediation to finalize data set for review.	2.00	300.00	600.00
1/29/2024	McLaughlin, Blake	Proceed with evaluating the collection and set up parameters for data processing. Perform evaluations as data received is processed into review application.	2.00	300.00	600.00
1/29/2024	Stecke, Curtis	Review contents of custodian cloud data set to confirm contents and applicable date range. Perform metadata extraction to prepare for keyword search application and Counsel review.	2.40	450.00	1,080.00
1/30/2024	McKenzie, Jimmy	Review of correspondence with Counsel and coordination with project team to prepare for the upcoming document review and production initiatives.	0.30	550.00	165.00
1/30/2024	Stecke, Curtis	Prepare extraction and metadata review of custodian mailbox account per Counsel request.	0.60	450.00	270.00
1/30/2024	Negangard, Kevin	Correspondence with project team regarding the revised custodian data preservation and analysis workplan to include subsequent data sources identified by Counsel.	0.60	850.00	510.00
1/30/2024	Michalek, Joe	Teleconference with project team to discuss the current status of the custodian data preservation, analysis, and review initiatives.	0.70	450.00	315.00
1/30/2024	Michalek, Joe	Teleconference with custodian to collect email and cloud data sources identified by Counsel.	0.90	450.00	405.00
1/30/2024	Michalek, Joe	Perform data extraction of additional custodian data set to prepare for keyword search application and Counsel review.	1.10	450.00	495.00
1/30/2024	Michalek, Joe	Teleconference with custodian to perform the forensic data preservation of email and cloud data sources identified by Counsel.	1.10	450.00	495.00
1/30/2024	Michalek, Joe	Prepare search analysis for Counsel regarding the identification of communication categories.	1.30	450.00	585.00
1/30/2024	Suri, Saira	Execute separate privilege and responsive searches from secondary set to replicate original searching efforts. Prepare overlap searches and share results with Counsel.	1.40	350.00	490.00
1/30/2024	Suri, Saira	Teleconference with project team and Counsel to discuss the review approach and revise review workflow based off of Counsel comments. Prepare summary for Counsel review.	1.60	350.00	560.00
1/30/2024	Suri, Saira	Prepare search term reports for revised searching efforts as well as a comparative report to demonstrate uniqueness of secondary set of terms requested by Counsel.	1.80	350.00	630.00
1/30/2024	McLaughlin, Blake	Coordination with project team to prepare custodian media for data extraction and conversation. Prepare revisions to the document review workspace in preparation for Counsel review.	1.90	300.00	570.00
1/30/2024	McLaughlin, Blake	Perform assessment of custodian media contents. Prepare extraction for search term application and Counsel review.	2.00	300.00	600.00
1/30/2024	McLaughlin, Blake	Prepare inventory and chain of custody records of custodian data sets. Prepare custodian document sets for keyword search application and Counsel review.	2.00	300.00	600.00
1/30/2024	Stecke, Curtis	Review contents of custodian cloud data set to confirm contents. Perform metadata extraction in preparation for keyword search application and Counsel review.	2.10	450.00	945.00

Date	Name	Description	Hours	Rate	Amount
1/30/2024	Michalek, Joe	Teleconference with custodians and Counsel to discuss the review platform, prepare relevant document searches, and address outstanding questions from Counsel.	2.30	450.00	1,035.00
1/31/2024	Suri, Saira	Prepare response to Counsel regarding the search analysis and document identification initiatives.	0.20	350.00	70.00
1/31/2024	Suri, Saira	Teleconference with project team to analyze current review workflow and prepare for discussion with Counsel.	0.30	350.00	105.00
1/31/2024	Suri, Saira	Prepare response to Counsel regarding the identification of documents for review.	0.30	350.00	105.00
1/31/2024	McKenzie, Jimmy	Teleconference with project team to analyze current review workflow and prepare for discussion with Counsel.	0.30	550.00	165.00
1/31/2024	McKenzie, Jimmy	Collaboration with project team in addressing review workflow items from Counsel.	0.30	550.00	165.00
1/31/2024	Negangard, Kevin	Correspondence with project team to address the workplan revisions requested by Counsel.	0.30	850.00	255.00
1/31/2024	Suri, Saira	Review search query from Counsel related to folder path analysis initiatives.	0.40	350.00	140.00
1/31/2024	Michalek, Joe	Teleconference with custodian to perform the custodian email and cloud backup data sources identified by Counsel.	0.40	450.00	180.00
1/31/2024	Oza, Vishal	Coordinate with project team on outstanding collections with data processing status into review platform; various Client communications.	0.40	675.00	270.00
1/31/2024	Suri, Saira	Teleconference with Counsel to discuss modifications to search approach and reporting format.	0.50	350.00	175.00
1/31/2024	Michalek, Joe	Teleconference with project team to finalize the workplan for data extraction and cloud data deduplication initiatives.	0.50	450.00	225.00
1/31/2024	Suri, Saira	Draft communication to Counsel to summarize meeting notes and receive confirm date range for revised searchable scope. Address follow-up inquiries with Counsel.	0.70	350.00	245.00
1/31/2024	Stecke, Curtis	Review contents of identified custodian cloud data source collection to validate contents and prepare for keyword search application and Counsel review.	0.70	450.00	315.00
1/31/2024	Michalek, Joe	Teleconference with project team and Counsel to discuss the current status of the data preservation, analysis, and review initiatives.	0.80	450.00	360.00
1/31/2024	Oza, Vishal	Conference call with Counsel regarding cloud data sources and next steps.	0.80	675.00	540.00
1/31/2024	Suri, Saira	Identification of overlap between privileged and responsive hits on secondary set of search terms and strategize with project team to develop an alternative search approach to better represent search results.	0.90	350.00	315.00
1/31/2024	Michalek, Joe	Correspondence with Counsel to discuss the document identification and review approach.	0.90	450.00	405.00
1/31/2024	Suri, Saira	Coordination with Counsel to prepare analysis of various iterations of search terms. Prepare summary for Counsel review.	1.10	350.00	385.00
1/31/2024	Michalek, Joe	Perform analysis of mobile device data to identify message date ranges requested by Counsel.	1.10	450.00	495.00
1/31/2024	Michalek, Joe	Teleconference with Counsel to discuss the current status of the forensic data collection, review, and production initiatives.	1.10	450.00	495.00
1/31/2024	Michalek, Joe	Perform extraction and validation of custodian cloud data source to prepare for keyword search application and Counsel review.	1.20	450.00	540.00
1/31/2024	Michalek, Joe	Complete collections of additional Cloud and Mail data sources.	1.30	450.00	585.00
1/31/2024	Michalek, Joe	Perform forensic analysis of custodian device to investigate targeted document categories identified by Counsel.	1.40	450.00	630.00
1/31/2024	McLaughlin, Blake	Perform metadata extraction of additional custodian data sets. Prepare review workspace for Counsel review. Coordinate with project team to finalize tracking materials and summary reporting for Counsel review.	1.90	300.00	570.00
1/31/2024	Suri, Saira	Implement revised search workflow per Counsel discussion. Prepare search term summary to represent unique hits from secondary set of search terms. Draft communication to Counsel with summary of approach and the initial findings.	1.90	350.00	665.00
1/31/2024	McLaughlin, Blake	Prepare inventory and chain of custody records of custodian data sets. Prepare custodian document sets for keyword search application and Counsel review.	2.00	300.00	600.00
1/31/2024	McLaughlin, Blake	Perform initial collection assessment and configuration for data processing. Conduct assessments in processing newly received data.	2.00	300.00	600.00
1/31/2024	Stecke, Curtis	Prepare summary report detailing the current status of custodian mobile device data collections for review by Counsel .Perform analysis of recently exported mobile data.	2.60	450.00	1,170.00
				<b>Total Fees</b>	<b>90,597.50</b>



EXHIBIT C



Alvarez & Marsal Disputes and Investigations, LLC  
540 West Madison Street, Suite 1800  
Chicago, IL 60661  
Telephone: 312-601-4220  
Fax: (312) 332-4599

March 27, 2024

Joshua Koltun, Attorney  
One Sansome Street  
Suite 3500, No. 500  
San Francisco, CA 94104

Invoice Reference #: 851207-240315200  
Marine Taxonomic Services

Dear Mr. Koltun:

Please find attached Alvarez & Marsal's invoice for Professional Fees rendered to Marine Taxonomic Services, Ltd. in relation to the non-party subpoena related to the California Sportfishing Protection Alliance v. Pacific Bell Telephone Companies matter. This invoice covers the period 02/01/2024 through 02/29/2024. As a reminder,

Please let me know if you have any questions regarding this invoice. We appreciate the opportunity to be of service to you.

Sincerely,

Kevin Negangard  
Managing Director



**Alvarez & Marsal Disputes and Investigations, LLC**

540 West Madison Street, Suite 1800

Chicago, IL 60661

Telephone: 312-601-4220

Fax: (312) 332-4599

March 27, 2024

**Reference Invoice #:****851207-240315200**

Joshua Koltun, Attorney  
 One Sansome Street  
 Suite 3500, No. 500  
 San Francisco, CA 94104

Invoice Reference #: 851207-240216000238  
 Marine Taxonomic Services

Professional Fees Rendered 02/01/2024 - 02/29/2024	\$	95,635.00
Admin Fee (4% of Professional Fees)	\$	3,825.40
Encrypted Electronic Media and Shipping Expenses	\$	351.38
Relativity User Fee - 3 Users - February 2024 (\$150/User)	\$	450.00
Secure Technology Infrastructure Fee (February 2024)	\$	1,500.00
<b>Total Amount Due</b>	<b>\$</b>	<b>101,761.78</b>

**Wire Instructions:**

Bank: Wells Fargo  
 ABA: 121000248  
 Swift: WFBIUS6S  
 IBAN:  
 Account Name: Alvarez & Marsal Disputes And Investigations LLC  
 Account Number: 2000018590539  
 Reference Invoice #: 851207-240315200  
 Notification Email: treasury@alvarezandmarsal.com

**For security purposes, all bank account changes should be verbally verified by contacting A&M using a known telephone number BEFORE funds are sent to a different account.**

**Mail Instructions:**

Alvarez & Marsal Disputes and Investigations, LLC  
 Attn: Liz Carrington  
 600 Madison Avenue  
 8th Floor  
 New York, NY 10022

**Alvarez & Marsal Disputes and Investigations, LLC**

540 West Madison Street, Suite 1800

Chicago, IL 60661

Telephone: 312-601-4220

Fax: (312) 332-4599

March 27, 2024

**Reference Invoice #:**

851207-240315200

Joshua Koltun Attorney  
 One Sansome Street  
 Suite 3500, No. 500  
 San Francisco, CA 94104

## Marine Taxonomic Services

Summary of Professional Fees 02/01/2024 - 02/29/2024				
Name	Position	Hours	Rate	Fees
Negangard, Kevin	Managing Director	4.40	\$ 850.00	\$ 3,740.00
Oza, Vishal	Senior Director	7.70	\$ 675.00	\$ 5,197.50
Bammert, Brett	Director	0.80	\$ 550.00	\$ 440.00
McKenzie, Jimmy	Director	34.30	\$ 550.00	\$ 18,865.00
Stecke, Curtis	E-Discovery Manager	9.90	\$ 450.00	\$ 4,455.00
Michalek, Joe	Manager	87.80	\$ 450.00	\$ 39,510.00
Suri, Saira	Senior Associate	46.45	\$ 350.00	\$ 16,257.50
McLaughlin, Blake	Associate	18.30	\$ 300.00	\$ 5,490.00
Nagle, Tyler	Associate	5.60	\$ 300.00	\$ 1,680.00
<b>Grand Total</b>		<b>215.25</b>		<b>95,635.00</b>



**Alvarez & Marsal Disputes and Investigations, LLC**  
 540 West Madison Street, Suite 1800  
 Chicago, IL 60661  
 Telephone: 312-601-4220  
 Fax: (312) 332-4599

March 27, 2024

**Reference Invoice #:**  
 851207-240315200

Joshua Koltun Attorney  
 One Sansome Street  
 Suite 3500, No. 500  
 San Francisco, CA 94104

Marine Taxonomic Services

Summary of Fees and Expenses 02/01/2024 - 02/29/2024					
Date	Name	Description	Hours	Rate	Amount
2/1/2024	Suri, Saira	Teleconference with project team to discuss the revised custodian data preservation and analysis initiatives.	0.30	350.00	105.00
2/1/2024	Michalek, Joe	Teleconference with project team to discuss the supplemental data collection search requests.	0.30	450.00	135.00
2/1/2024	Michalek, Joe	Perform forensic analysis to confirm deduplication protocol and accuracy.	0.40	450.00	180.00
2/1/2024	Michalek, Joe	Teleconference with custodian to discuss review protocol and analysis methodology.	0.60	450.00	270.00
2/1/2024	Suri, Saira	Teleconference with Counsel to discuss implementation of revised search terms as well as review workflow.	0.70	350.00	245.00
2/1/2024	Michalek, Joe	Perform analysis of provided search terms. Prepare preliminary report of the initial results for Counsel review.	0.70	450.00	315.00
2/1/2024	Stecke, Curtis	Perform initial collection assessment and configuration for additional custodian data extraction initiatives. Conduct media assessment and prepare custodian media for extraction and search term application.	0.70	450.00	315.00
2/1/2024	Negangard, Kevin	Correspondence with project team to review the ESI review and production initiatives. Prepare revised workplan for Counsel discussion.	0.70	850.00	595.00
2/1/2024	Suri, Saira	Draft communication to Counsel regarding implementation of revised search terms. Address follow-up inquiries. Modify search workflow based off of Counsel comments.	0.80	350.00	280.00
2/1/2024	Michalek, Joe	Prepare revisions to the document review workspace to update document coding and field values for confidential data identified by Counsel.	0.90	450.00	405.00
2/1/2024	Suri, Saira	Teleconference with Counsel to discuss culling of review population, status of data extraction, and finalize review workflow.	1.00	350.00	350.00
2/1/2024	Michalek, Joe	Perform document analysis to identify potentially confidential or relevant documents based on search term responsiveness.	1.10	450.00	495.00
2/1/2024	Stecke, Curtis	Analysis of processing errors and discrepancies followed by standard quality assurance protocols. Prepare comprehensive reports detailing data volumes processed.	1.20	450.00	540.00
2/1/2024	Michalek, Joe	Teleconference with Counsel to discuss requested revisions to the data collection workplan and additional search requests.	1.30	450.00	585.00
2/1/2024	Michalek, Joe	Perform forensic analysis to segregate term-responsive documents based on the type of responsiveness. Compare header metadata versus documents that hit on terms only in their content.	1.40	450.00	630.00
2/1/2024	Suri, Saira	Coordinate with Counsel to revise search terms and update review scope. Update reviewer statistic searches and set up attorney-client privilege searches.	1.60	350.00	560.00
2/1/2024	Suri, Saira	Coordinate with Counsel to revise searchable scope to include new data. Prepare comparative report of multiple iterations of searches in an effort to cull review population.	1.80	350.00	630.00
2/1/2024	McLaughlin, Blake	Prepare revisions to the evidence tracking system to include media details of additional custodian data sets identified for preservation and analysis.	1.90	300.00	570.00
2/1/2024	McLaughlin, Blake	Analysis of processing errors and discrepancies followed by standard quality assurance protocols. Prepare comprehensive reports detailing data volumes processed.	2.00	300.00	600.00
2/1/2024	McLaughlin, Blake	Perform initial collection assessment and configuration for data processing. Conduct routine assessments in processing newly received data.	2.00	300.00	600.00
2/1/2024	Michalek, Joe	Conduct data extractions of identified content per Counsel discussion and prepare document set for Counsel review.	2.10	450.00	945.00
2/2/2024	Michalek, Joe	Teleconference with custodian to review mass-tagging of documents from specified directories.	0.50	450.00	225.00

Date	Name	Description	Hours	Rate	Amount
2/2/2024	Negangard, Kevin	Discussion with project team regarding the revised custodian data preservation and analysis workplan. Provide comments regarding the revised review and production approach.	0.60	850.00	510.00
2/2/2024	Michalek, Joe	Teleconference with Counsel to discuss protocol for outstanding documents to review.	0.70	450.00	315.00
2/2/2024	Stecke, Curtis	Prepare summary reporting to reflect current status of custodian cloud data collections for review by Counsel. Prepare resulting data sets for extraction.	0.80	450.00	360.00
2/2/2024	Michalek, Joe	Teleconference with custodian and Counsel to discuss search term analysis results and data collection reporting.	0.80	450.00	360.00
2/2/2024	Michalek, Joe	Perform the identification of targeted document sets based on Counsel instruction.	0.90	450.00	405.00
2/2/2024	Oza, Vishal	Coordinate with project team on outstanding collections with data processing status into review platform; various client communications.	1.00	675.00	675.00
2/2/2024	Michalek, Joe	Teleconference with review team to review the search and identification approach.	1.20	450.00	540.00
2/2/2024	Stecke, Curtis	Perform metadata extraction of identified custodian media to prepare for keyword search application and Counsel review.	1.30	450.00	585.00
2/2/2024	Michalek, Joe	Prepare search term analysis report to identify additional documents that are responsive to Counsel search terms.	1.60	450.00	720.00
2/2/2024	Michalek, Joe	Teleconference with Counsel to discuss outstanding documents for review, search criteria, and alterations to existing searches.	1.60	450.00	720.00
2/2/2024	McLaughlin, Blake	Perform evidence handling and chain of custody management for new data collections. Coordinate with project team to finalize tracking materials.	1.90	300.00	570.00
2/2/2024	McLaughlin, Blake	Prepare inventory and chain of custody records of custodian data sets. Prepare custodian document sets for keyword search application and Counsel review.	2.00	300.00	600.00
2/2/2024	McLaughlin, Blake	Proceed with evaluating the collection and set up parameters for data processing. Perform evaluations as data received is processed into review application.	2.00	300.00	600.00
2/3/2024	Michalek, Joe	Perform analysis of documents responsive to specific search terms provided by Counsel.	0.60	450.00	270.00
2/3/2024	Bammert, Brett	Deploy structured analytics for the application of email threading across tentative review population at the request of Counsel.	0.80	550.00	440.00
2/3/2024	Michalek, Joe	Conduct metadata extraction of additional custodian data sets and prepare review workspace for Counsel review.	0.90	450.00	405.00
2/3/2024	Michalek, Joe	Perform search term analysis to identify term responsive documents for Counsel review.	0.90	450.00	405.00
2/3/2024	Michalek, Joe	Assist Counsel to identify document populations that are potentially privileged and prepared relevant searches.	1.00	450.00	450.00
2/3/2024	Michalek, Joe	Review the document categories identified by Counsel. Prepare search approach for Counsel review.	1.10	450.00	495.00
2/3/2024	Michalek, Joe	Execute search term analysis to identify document populations based on Counsel discussion. Prepare preliminary summary report for Counsel review.	1.20	450.00	540.00
2/3/2024	Michalek, Joe	Teleconference with Counsel and review team to discuss the review and production action items.	1.30	450.00	585.00
2/4/2024	Michalek, Joe	Teleconference with Counsel and review team to discuss the document review status and workplan initiatives.	0.80	450.00	360.00
2/4/2024	Nagle, Tyler	Conduct analysis across collected mail stores and perform required remediation to finalize data set for review.	0.90	300.00	270.00
2/4/2024	Michalek, Joe	Teleconference with review team to identify documents based on file directory.	0.90	450.00	405.00
2/4/2024	Michalek, Joe	Coordinate with project team to review data extraction initiatives related to the media sets identified by Counsel.	0.90	450.00	405.00
2/4/2024	Michalek, Joe	Perform forensic analysis to identify documents responsive to search terms provided by Counsel that may require further review.	1.10	450.00	495.00
2/4/2024	Michalek, Joe	Perform search term analysis to identify term-responsive documents identified by Counsel. Finalize the summary report for Counsel review.	1.30	450.00	585.00
2/4/2024	Michalek, Joe	Identify document categories specified by Counsel based on file extension and folder directory analysis.	1.70	450.00	765.00
2/4/2024	Michalek, Joe	Create document search categories per ad hoc requests from Counsel and review team. Finalize the summary report for Counsel review and discussion.	2.30	450.00	1,035.00
2/5/2024	Suri, Saira	Teleconference with project team to prepare the requested status update regarding the review initiatives.	0.25	350.00	87.50
2/5/2024	Suri, Saira	Coordinate with Counsel to prepare revised review sets based on criteria discussed with Counsel.	0.30	350.00	105.00
2/5/2024	Negangard, Kevin	Review correspondence with Counsel regarding the revised discovery initiatives.	0.30	850.00	255.00
2/5/2024	Suri, Saira	Coordinate with Counsel to prepare search identification for document review.	0.40	350.00	140.00

Date	Name	Description	Hours	Rate	Amount
2/5/2024	McKenzie, Jimmy	Review of correspondence with Counsel and project team for ongoing and outstanding items related to the collection, extraction, and document review initiatives.	0.40	550.00	220.00
2/5/2024	Negangard, Kevin	Correspondence with project team to review the revised review and production initiatives.	0.40	850.00	340.00
2/5/2024	Suri, Saira	Coordination with Counsel to scope document review categories within the review population.	0.50	350.00	175.00
2/5/2024	Michalek, Joe	Teleconference with Counsel to review the document review status and confirm outstanding tasks.	0.50	450.00	225.00
2/5/2024	Suri, Saira	Teleconference with project team to discuss current workstreams with Counsel regarding the document review and analysis initiatives.	0.60	350.00	210.00
2/5/2024	Michalek, Joe	Create supplemental custodial data summary for Counsel to provide count of unique documents being added to the review workspace.	0.60	450.00	270.00
2/5/2024	Michalek, Joe	Conduct duplicate document analysis and clarification with Counsel on deduplication methodology.	0.60	450.00	270.00
2/5/2024	Michalek, Joe	Teleconference with project team to discuss current workstreams with Counsel regarding the document review and production initiatives.	0.60	450.00	270.00
2/5/2024	McKenzie, Jimmy	Teleconference with project team to discuss current workstreams with Counsel regarding the document review and production initiatives.	0.60	550.00	330.00
2/5/2024	McKenzie, Jimmy	Review of ESI production specification. Gather information and work with team to begin drafting communication to Counsel for review and comments.	0.60	550.00	330.00
2/5/2024	Michalek, Joe	Prepare response to Counsel regarding the identification of document categories based on file path analysis results.	0.70	450.00	315.00
2/5/2024	Suri, Saira	Teleconference with project team to discuss upcoming production workflow, analytics setup, and initiatives with Counsel.	0.80	350.00	280.00
2/5/2024	McKenzie, Jimmy	Continue coordination with project team to address numerous additional document review and search requests from Counsel.	0.80	550.00	440.00
2/5/2024	McKenzie, Jimmy	Teleconference with project team to discuss upcoming production workflow, analytics setup, and revised workplan with Counsel.	0.80	550.00	440.00
2/5/2024	Oza, Vishal	Teleconference with project team to discuss upcoming production workflow.	0.80	675.00	540.00
2/5/2024	Nagle, Tyler	Conduct analysis across collected mail stores and perform required remediation to finalize data set for review.	0.90	300.00	270.00
2/5/2024	Michalek, Joe	Prepare search analysis for Counsel regarding the identification of communication categories.	0.90	450.00	405.00
2/5/2024	Michalek, Joe	Perform search term analysis to identify review categories identified by Counsel. Prepare summary report for Counsel discussion.	1.10	450.00	495.00
2/5/2024	Suri, Saira	Prepare search analysis for Counsel to identify the review categories. Prepare identified document review categories at the request of Counsel.	1.30	350.00	455.00
2/5/2024	Michalek, Joe	Perform forensic analysis of identified media sets provided by Counsel. Prepare preliminary findings for Counsel review.	1.30	450.00	585.00
2/5/2024	Michalek, Joe	Prepare search analysis for Counsel regarding the identification of communication categories.	1.70	450.00	765.00
2/5/2024	McLaughlin, Blake	Perform forensic analysis of data set followed by standard quality assurance protocols.	2.00	300.00	600.00
2/5/2024	McLaughlin, Blake	Perform data collection assessment and configuration for data processing. Conduct assessments in processing newly received data.	2.00	300.00	600.00
2/5/2024	Michalek, Joe	Meeting with Counsel to identify categories of documents for review based on requested search terms or other criteria specified by Counsel.	2.30	450.00	1,035.00
2/5/2024	Stecke, Curtis	Prepare summary reporting of the custodian media contents for review by Counsel. Prepare resulting data sets for extraction.	2.60	450.00	1,170.00
2/6/2024	Michalek, Joe	Teleconference with project team to discuss production logic in addressing Counsel feedback.	0.20	450.00	90.00
2/6/2024	McKenzie, Jimmy	Assist project team in data extraction for supplemental collected data and preparation of documents for review.	0.20	550.00	110.00
2/6/2024	McKenzie, Jimmy	Teleconference with project team to discuss production logic in addressing Counsel comments.	0.20	550.00	110.00
2/6/2024	McKenzie, Jimmy	Continue working with project team on production preparation and preparing database to comply with ESI specifications.	0.30	550.00	165.00
2/6/2024	McKenzie, Jimmy	Continue coordination with project team to address numerous additional document review and search requests from Counsel.	0.40	550.00	220.00
2/6/2024	Suri, Saira	Prepare response to Counsel regarding the documents categories within the remaining review population.	0.60	350.00	210.00
2/6/2024	Michalek, Joe	Teleconference with review team to identify additional document categories based on file path.	0.60	450.00	270.00
2/6/2024	Michalek, Joe	Perform analysis of documents identified by Counsel to verify accuracy of search term responsiveness.	0.60	450.00	270.00
2/6/2024	McKenzie, Jimmy	Conduct document analysis across targeted data set at the request of Counsel. Document findings and communicate to team for providing to Counsel.	0.60	550.00	330.00

Date	Name	Description	Hours	Rate	Amount
2/6/2024	McKenzie, Jimmy	Prepare current production logic and prepare exclusion searches based on Counsel guidance. Draft and communicate information to Counsel for review and feedback.	0.60	550.00	330.00
2/6/2024	Michalek, Joe	Identify document population and follow up with Counsel to address outstanding documents identified for review prior to production.	0.70	450.00	315.00
2/6/2024	Michalek, Joe	Identify documents that require additional review for confidentiality based on ad hoc parameters provided by Counsel.	0.70	450.00	315.00
2/6/2024	McKenzie, Jimmy	Continue collaboration with Counsel in preparing production volume. Work with project team to continue analysis across production universe and set up conflict searches. Assist in finalizing communication to Counsel for feedback.	0.80	550.00	440.00
2/6/2024	Michalek, Joe	Teleconference with Counsel to confirm review initiatives and family responsiveness coding for production population.	0.90	450.00	405.00
2/6/2024	Suri, Saira	Teleconference with Counsel and project team to discuss production schedule, production logistics, and remaining document review initiatives.	1.10	350.00	385.00
2/6/2024	McLaughlin, Blake	Perform validation of additional custodian data source. Prepare for custodian data set extraction and keyword search application.	1.20	300.00	360.00
2/6/2024	McLaughlin, Blake	Prepare comprehensive reports detailing data set volumes processed.	1.30	300.00	390.00
2/6/2024	Suri, Saira	Teleconference with project team to further discuss production contents, analyze reviewer coding for conflict searches, and workflow for communication to Counsel.	1.30	350.00	455.00
2/6/2024	Michalek, Joe	Perform analysis of search terms to identify document categories for supplemental custodian media identified by Counsel.	1.30	450.00	585.00
2/6/2024	McKenzie, Jimmy	Teleconference with Counsel, Client, and project team to discuss production schedule, production logistics, and remaining document review.	1.30	550.00	715.00
2/6/2024	McKenzie, Jimmy	Teleconference with project team to further discuss production set up and workflow for communication to Counsel.	1.30	550.00	715.00
2/6/2024	Oza, Vishal	Teleconference with project team to further discuss production set up and workflow for communication to Counsel.	1.30	675.00	877.50
2/6/2024	Michalek, Joe	Correspondence with Counsel to identify additional document categories based on revised search terms. Prepare summary for Counsel discussion.	1.40	450.00	630.00
2/6/2024	Suri, Saira	Review ESI protocol and draft correspondence to Counsel with items related to production planning.	1.90	350.00	665.00
2/6/2024	Michalek, Joe	Analysis of search term categories against supplemental custodian data. Finalize the preliminary results for Counsel discussion regarding the review approach.	2.10	450.00	945.00
2/6/2024	Stecke, Curtis	Perform analysis of processing records followed by quality assurance protocols. Prepare comprehensive reports detailing data volumes extracted for Counsel review.	2.40	450.00	1,080.00
2/7/2024	Nagle, Tyler	Update evidence handling and chain of custody management for new data collections. Coordinate with project team to finalize tracking materials.	0.40	300.00	120.00
2/7/2024	Negangard, Kevin	Correspondence with project team to address the workplan revisions requested by Counsel.	0.40	850.00	340.00
2/7/2024	Suri, Saira	Teleconference with Counsel and project team to discuss finalizing production volume.	0.60	350.00	210.00
2/7/2024	Michalek, Joe	Coordinate with project team to finalize production in the database and prepare for export.	0.60	450.00	270.00
2/7/2024	Michalek, Joe	Teleconference with Counsel and project team to discuss the production initiatives.	0.60	450.00	270.00
2/7/2024	McKenzie, Jimmy	Teleconference with Counsel, Client, and project team to discuss finalizing production volume.	0.60	550.00	330.00
2/7/2024	Oza, Vishal	Teleconference with Counsel, Client, and project team to discuss finalizing production volume.	0.60	675.00	405.00
2/7/2024	Michalek, Joe	Correspondence with Counsel to address the handling of document families with inconsistent coding.	0.70	450.00	315.00
2/7/2024	Suri, Saira	Teleconference with project team to continue preparing review workspace for upcoming production volume.	0.80	350.00	280.00
2/7/2024	Michalek, Joe	Correspondence with Counsel to identify document review categories based on criteria provided by Counsel.	0.80	450.00	360.00
2/7/2024	Michalek, Joe	Teleconference with project team to finalize specialized metadata to populate for production based on the ESI protocol.	0.80	450.00	360.00
2/7/2024	McKenzie, Jimmy	Teleconference with project team to finalize custom metadata to populate for production.	0.80	550.00	440.00
2/7/2024	McKenzie, Jimmy	Teleconference with project team to continue preparing database for upcoming production volume.	0.80	550.00	440.00
2/7/2024	Michalek, Joe	Teleconference with project team to finalize production preparation in coordination with Counsel and prepare volume for export.	0.90	450.00	405.00
2/7/2024	McKenzie, Jimmy	Teleconference with project team to finalize production preparation in coordination with Counsel and prepare volume for export.	0.90	550.00	495.00
2/7/2024	Suri, Saira	Finalize production metadata analysis within the review workspace in preparation for production. Confirm ESI protocol metadata categories.	1.10	350.00	385.00

Date	Name	Description	Hours	Rate	Amount
2/7/2024	Michalek, Joe	Perform search analysis to identify search term categories and metrics based on revised terms provided by Counsel.	1.10	450.00	495.00
2/7/2024	McKenzie, Jimmy	Prepare production field mapping in review of ESI specifications. Prepare production for export. Conduct production export. Finalize production export and begin preparation for delivery media.	1.10	550.00	605.00
2/7/2024	Michalek, Joe	Teleconference with project team to continue preparation of production volume, flag targeted items for Counsel comments, and prepare documents for production.	1.20	450.00	540.00
2/7/2024	McKenzie, Jimmy	Teleconference with project team to continue preparation of production volume, flag targeted items for Counsel feedback, and prepare documents for branding.	1.20	550.00	660.00
2/7/2024	McKenzie, Jimmy	Collaborate with Counsel and project team to continue building upcoming production volume. Prepare database for custom fields based on ESI protocol. Review and analyze production scope to further work with Counsel.	1.30	550.00	715.00
2/7/2024	Michalek, Joe	Finalize production population and examine contents for Counsel discussion. Prepare summary of contents prior to finalizing the production.	1.40	450.00	630.00
2/7/2024	Suri, Saira	Coordination with project team to finalize production within the review workspace and prepare for export.	1.50	350.00	525.00
2/7/2024	Suri, Saira	Finalize the initial scoping of production population and coordinate with project team to set up validation searches.	1.50	350.00	525.00
2/7/2024	McKenzie, Jimmy	Continue collaboration with project team and Counsel to work through production volume. Finalize report for Counsel review and feedback. Prepare production searches for set and update documents for branding. Conduct production branding.	1.60	550.00	880.00
2/7/2024	Suri, Saira	Prepare specialized production metadata fields for upcoming production per the ESI protocol.	1.70	350.00	595.00
2/7/2024	Suri, Saira	Perform analysis of production metadata within the review workspace in preparation for production related to the ESI protocol requirements.	1.90	350.00	665.00
2/8/2024	Nagle, Tyler	Teleconference with project team to finalize preparation of multiple production drives for delivery to separate parties.	0.30	300.00	90.00
2/8/2024	McKenzie, Jimmy	Teleconference with project team to finalize preparation of multiple production drives for delivery to separate parties.	0.30	550.00	165.00
2/8/2024	Michalek, Joe	Teleconference with Counsel to develop review workflow for data search term refinement and statistics collection.	0.50	450.00	225.00
2/8/2024	McKenzie, Jimmy	Prepare production report at the request of Counsel and deliver for review. Address additional inquiries from Counsel regarding production. Provide chain of custodian documentation in coordination with project team.	0.70	550.00	385.00
2/8/2024	Nagle, Tyler	Begin evidence handling and chain of custody management for data collections. Coordinate with project team to gather tracking materials.	0.80	300.00	240.00
2/8/2024	Nagle, Tyler	Continue evidence handling and chain of custody management for data collections. Coordinate with project team to finalize tracking materials.	0.80	300.00	240.00
2/8/2024	Michalek, Joe	Prepare analysis of search terms to identify supplemental document categories resulting from revised search terms.	0.80	450.00	360.00
2/8/2024	Michalek, Joe	Perform search analysis to identify search term categories and metrics based on revised terms provided by Counsel.	0.80	450.00	360.00
2/8/2024	Nagle, Tyler	Finalize evidence handling and chain of custody management for data collections. Coordinate with project team to finalize tracking materials.	0.90	300.00	270.00
2/8/2024	Michalek, Joe	Develop review statistics search categories for Counsel related to the search term refinement initiatives.	0.90	450.00	405.00
2/8/2024	McKenzie, Jimmy	Preparation of delivery letters in coordination with Counsel. Verify shipments and delivery with project team. Provide additional information to Counsel for official release.	1.20	550.00	660.00
2/8/2024	McKenzie, Jimmy	Finalize production volume and multiple hard drive preparations for delivery. Continue coordination with project team to finalize deliveries.	1.60	550.00	880.00
2/8/2024	Michalek, Joe	Perform analysis of search terms to identify document categories for supplemental custodian media identified by Counsel.	1.70	450.00	765.00
2/8/2024	Michalek, Joe	Create review search analysis for each search term provided by Counsel to identify document review population for subsequent production.	2.40	450.00	1,080.00
2/9/2024	Michalek, Joe	Teleconference with project team to discuss review workstreams for upcoming production.	0.30	450.00	135.00
2/9/2024	McKenzie, Jimmy	Teleconference with project team to discuss multiple review workstreams for upcoming production.	0.30	550.00	165.00
2/9/2024	Michalek, Joe	Teleconference with Counsel to discuss review status and outstanding initiatives related to the review and production workplan.	0.40	450.00	180.00
2/9/2024	Oza, Vishal	Teleconference with project team to discuss multiple review workstreams for upcoming production.	0.50	675.00	337.50
2/9/2024	Michalek, Joe	Perform analysis of document categories to identify document population of search terms provided by Counsel.	0.60	450.00	270.00



Date	Name	Description	Hours	Rate	Amount
2/9/2024	McKenzie, Jimmy	Teleconference with Counsel, Client, and project team to discuss finalizing additional review and preparing for upcoming production.	0.60	550.00	330.00
2/9/2024	Negangard, Kevin	Correspondence with project team regarding the custodian communication analysis initiatives. Review correspondence with Counsel regarding the revised analysis approach.	0.60	850.00	510.00
2/9/2024	Michalek, Joe	Perform data extraction of additional custodian media set to prepare for keyword search application and Counsel review.	0.80	450.00	360.00
2/9/2024	McKenzie, Jimmy	Continue collaboration with Counsel regarding privilege document review and additional QC efforts in preparing production volume. Analyze reviewer coding to address follow up inquiries from Counsel.	0.80	550.00	440.00
2/9/2024	Michalek, Joe	Teleconference with Counsel and project team to discuss finalizing additional review approach and preparing for upcoming production.	0.90	450.00	405.00
2/9/2024	Michalek, Joe	Prepare summary review statistics for Counsel addressing search term, review counts, and false positive analysis.	0.90	450.00	405.00
2/9/2024	McKenzie, Jimmy	Continue addressing inquiries from Counsel and Client with project team to finalize review. Prepare waterfall for targeted document scope in discussion with Counsel. Finalize logic and communicate information to Counsel for review and feedback.	0.90	550.00	495.00
2/9/2024	Michalek, Joe	Perform search summary within the review platform to examine document coding and finalize production population.	1.10	450.00	495.00
2/9/2024	Michalek, Joe	Prepare requested search analysis within the document review workspace per Counsel specifications. Finalize the summary and associated metrics for Counsel review.	1.40	450.00	630.00
2/9/2024	Michalek, Joe	Perform analysis of custodian's message data from cloud data backups to confirm conversation metrics and reporting for Counsel.	1.80	450.00	810.00
2/10/2024	McKenzie, Jimmy	Continue coordination with project team to address inquiries from Counsel regarding current document review and upcoming production.	0.30	550.00	165.00
2/10/2024	Suri, Saira	Correspondence with Counsel regarding the initiatives to execute search terms across supplemental custodian media and summarize results for Counsel.	1.10	350.00	385.00
2/10/2024	Michalek, Joe	Prepare analysis of document categories to identify document population of search terms provided by Counsel.	1.20	450.00	540.00
2/11/2024	Michalek, Joe	Perform extraction of data listing of search term categories requested by Counsel.	0.30	450.00	135.00
2/11/2024	Suri, Saira	Coordination with Counsel to prepare targeted search analysis across identified custodian data sources for Counsel review.	1.30	350.00	455.00
2/12/2024	Michalek, Joe	Perform post-extraction validation and email threading for subsequent custodian data sources identified for Counsel review.	0.30	450.00	135.00
2/12/2024	McKenzie, Jimmy	Review and finalize production volume with project team. Assist in final delivery to Counsel.	0.40	550.00	220.00
2/12/2024	McKenzie, Jimmy	Continue working with project team in address inquiries from Counsel regarding document review workstreams. Begin preparation for upcoming production volume.	0.40	550.00	220.00
2/12/2024	Suri, Saira	Teleconference with project team to begin preparations for supplemental production volume.	0.50	350.00	175.00
2/12/2024	Suri, Saira	Teleconference with Counsel and project team to discuss remaining document review workstreams and upcoming production initiatives.	0.50	350.00	175.00
2/12/2024	Michalek, Joe	Teleconference with project team to begin preparations for supplemental production volume.	0.50	450.00	225.00
2/12/2024	Michalek, Joe	Teleconference with Counsel and project team to discuss remaining document review workstreams and upcoming production initiatives.	0.50	450.00	225.00
2/12/2024	McKenzie, Jimmy	Teleconference with Counsel and project team to discuss remaining document review workstreams and upcoming production.	0.50	550.00	275.00
2/12/2024	McKenzie, Jimmy	Teleconference with project team to begin preparations for new production volume.	0.50	550.00	275.00
2/12/2024	Oza, Vishal	Teleconference with project team to begin preparations for new production volume.	0.50	675.00	337.50
2/12/2024	Michalek, Joe	Prepare production review searches and follow up with Counsel regarding outstanding items to review.	0.70	450.00	315.00
2/12/2024	Suri, Saira	Coordinate with project team to prepare the initial scope of relevant communication categories for Counsel review.	0.90	350.00	315.00
2/12/2024	Michalek, Joe	Perform analysis of custodian message data from cloud backups to confirm conversation reporting for Counsel review.	0.90	450.00	405.00
2/12/2024	Stecke, Curtis	Perform metadata extraction of identified custodian media to prepare for keyword search application and Counsel review.	0.90	450.00	405.00
2/12/2024	Michalek, Joe	Perform collection of exchange data for additional custodian from cloud data source.	0.90	450.00	405.00
2/12/2024	McKenzie, Jimmy	Continue preparation for new production volume in coordination with project team. Finalize initial production set up and assist in population of custom production fields in preparation for export. Prepare supplemental report at the request of Counsel.	1.10	550.00	605.00
2/12/2024	Michalek, Joe	Perform analysis of documents from custodian cloud backup data to identify review categories based on Counsel criteria.	1.30	450.00	585.00
2/12/2024	Suri, Saira	Export production and prepare volume for validation. Draft summary and coordinate transfer of file to Counsel.	1.70	350.00	595.00



Date	Name	Description	Hours	Rate	Amount
2/12/2024	Suri, Saira	Finalize production population and prepare validation searches. Review document images and update specialized production-facing fields per the ESI protocol.	1.80	350.00	630.00
2/13/2024	Negangard, Kevin	Meeting with project team regarding the targeted communication analysis and production initiatives.	0.30	850.00	255.00
2/15/2024	Negangard, Kevin	Prepare comments for project team regarding the revised review and production initiatives. Discussion regarding the data source analysis.	0.40	850.00	340.00
2/16/2024	McKenzie, Jimmy	Coordinate with project team to begin preparations for re-production at the request of Counsel.	0.20	550.00	110.00
2/16/2024	Suri, Saira	Prepare production cross reference at the request of Counsel.	0.30	350.00	105.00
2/16/2024	Suri, Saira	Coordinate with project team to finalize the revised production and deliver to Counsel.	0.50	350.00	175.00
2/16/2024	McKenzie, Jimmy	Coordinate with project team to review and finalize new production volume. Assist in communication for delivery to Counsel. Address follow up requests from Counsel.	0.70	550.00	385.00
2/16/2024	Oza, Vishal	Assist in communication for delivery to Counsel; address follow up requests from Counsel.	0.70	675.00	472.50
2/16/2024	Suri, Saira	Prepare and export revised production to include documents with confidentiality designations requested by Counsel.	0.90	350.00	315.00
2/16/2024	Michalek, Joe	Perform analysis of search terms to identify document categories for supplemental custodian media identified by Counsel.	1.10	450.00	495.00
2/20/2024	Negangard, Kevin	Correspondence with Counsel and project team to review the historical custodian data sets related to the information requests.	0.30	850.00	255.00
2/20/2024	Suri, Saira	Correspondence with Counsel to identify requested document categories.	0.40	350.00	140.00
2/20/2024	McKenzie, Jimmy	Continue coordination with project team in addressing Counsel requests regarding search terms and document review.	0.40	550.00	220.00
2/20/2024	Oza, Vishal	Continue coordination with project team in addressing Counsel requests regarding search terms and document review.	0.40	675.00	270.00
2/20/2024	Suri, Saira	Teleconference with project team to discuss search queries requested by Counsel. Prepare initial summary for Counsel review.	0.50	350.00	175.00
2/20/2024	McKenzie, Jimmy	Teleconference with project team to discuss current search terms, syntax, and results for Counsel review.	0.50	550.00	275.00
2/20/2024	Oza, Vishal	Teleconference with project team to discuss current search terms, syntax, and results for Counsel review.	0.50	675.00	337.50
2/20/2024	Suri, Saira	Prepare requested search summary for individual search terms and compile related statistics for Counsel.	0.60	350.00	210.00
2/20/2024	Michalek, Joe	Teleconference with Counsel to review the preliminary results of the analysis findings.	0.60	450.00	270.00
2/20/2024	Michalek, Joe	Perform analysis of supplemental media set to identify review categories associated with the search terms provided by Counsel.	0.70	450.00	315.00
2/20/2024	Michalek, Joe	Finalize the analysis of supplemental document categories identified by Counsel.	0.90	450.00	405.00
2/20/2024	Michalek, Joe	Perform analysis of search terms to identify document categories for supplemental custodian media identified by Counsel.	1.10	450.00	495.00
2/20/2024	Michalek, Joe	Correspondence with Counsel to identify document review categories based on criteria provided by Counsel.	1.30	450.00	585.00
2/21/2024	Suri, Saira	Teleconference with project team to discuss upcoming production scope and remaining review population.	0.30	350.00	105.00
2/21/2024	McKenzie, Jimmy	Continue coordination with project team to address Counsel inquiries regarding remaining document review and upcoming production.	0.30	550.00	165.00
2/21/2024	McKenzie, Jimmy	Teleconference with project team to discuss upcoming production scope and remaining review population.	0.30	550.00	165.00
2/21/2024	Negangard, Kevin	Review approach for performing analysis and data preservation of subsequent custodian data sources. Meeting with project team to review the external document analysis initiatives.	0.40	850.00	340.00
2/21/2024	Suri, Saira	Provide coding history for documents scoped for production. Adjust scoping searches at the request of Counsel.	0.60	350.00	210.00
2/22/2024	Suri, Saira	Draft follow-up responses to Counsel regarding in queue productions. Review Counsel comments regarding the production scope.	0.40	350.00	140.00
2/22/2024	Suri, Saira	Prepare the initial scoping searches for production for Counsel and draft communication with follow-up queries for Counsel confirmation.	0.40	350.00	140.00
2/22/2024	Michalek, Joe	Communication with Counsel to confirm revisions to the document review population.	0.40	450.00	180.00
2/22/2024	McKenzie, Jimmy	Continue preparation of additional production and re-production volumes with project team. Gather additional items for comments from Counsel.	0.40	550.00	220.00
2/22/2024	Suri, Saira	Teleconference with project team to analyze production and re-production scopes to begin preparation for branding and feedback to Counsel.	0.60	350.00	210.00
2/22/2024	McKenzie, Jimmy	Teleconference with project team to analyze production and re-production scopes to begin preparation for branding and feedback to Counsel.	0.60	550.00	330.00

Date	Name	Description	Hours	Rate	Amount
2/22/2024	McKenzie, Jimmy	Continue collaboration with project team to address Counsel inquiries regarding collection, review, and production.	0.60	550.00	330.00
2/22/2024	Oza, Vishal	Teleconference with project team to analyze production and re-production scope.	0.60	675.00	405.00
2/22/2024	Michalek, Joe	Discussion with Counsel regarding the production analysis initiatives to confirm the inclusion of supplemental custodian data identified by Counsel.	0.80	450.00	360.00
2/22/2024	Suri, Saira	Prepare identified document categories for revised production. Finalize and export production for Counsel review.	1.10	350.00	385.00
2/22/2024	Suri, Saira	Prepare validation searches for production and draft correspondence to Counsel regarding follow-up items.	1.20	350.00	420.00
2/22/2024	Suri, Saira	Coordination with Counsel to identify documents for supplemental production and provide requested coding history. Provide responses to follow-up questions from Counsel.	1.30	350.00	455.00
2/22/2024	Suri, Saira	Prepare the identified production set within the review workspace. Prepare production delivery for Counsel confirmation and review.	1.40	350.00	490.00
2/23/2024	Suri, Saira	Teleconference with project team to discuss production logistics and formatting revised production volume.	0.20	350.00	70.00
2/23/2024	McKenzie, Jimmy	Collaborate with Counsel for additional production delivery and logistics.	0.20	550.00	110.00
2/23/2024	McKenzie, Jimmy	Teleconference with project team to discuss production logistics and formatting for supplemental production volume.	0.20	550.00	110.00
2/23/2024	Oza, Vishal	Teleconference with project team to discuss production logistics and call with Counsel.	0.80	675.00	540.00
2/23/2024	McKenzie, Jimmy	Coordinate with project team to build updated production and re-production volumes with feedback from Counsel. Review and analyze volumes and finalize for delivery.	1.20	550.00	660.00
2/23/2024	Suri, Saira	Coordination with project team to finalize outgoing production set requested by Counsel. Prepare production summaries and coordinate production deliveries.	1.70	350.00	595.00
2/23/2024	Suri, Saira	Coordinate with Counsel to finalize the production volume. Confirm the final deliverable and prepare summary for Counsel review.	1.90	350.00	665.00
2/26/2024	Nagle, Tyler	Update evidence handling and chain of custody management for data collections. Coordinate with project team to finalize tracking materials.	0.60	300.00	180.00
2/26/2024	McKenzie, Jimmy	Coordinate with project team to prepare new production hard drive for legacy volumes and preparing for shipment. Prepare refreshed production information for delivery to new party. Create production report and delivery updated information.	1.80	550.00	990.00
2/27/2024	McKenzie, Jimmy	Prepare response to Counsel inquiries regarding the recently delivered production media.	0.10	550.00	55.00
<b>Total Hours</b>					<b>95,635.00</b>

EXHIBIT D



**Alvarez & Marsal Disputes and Investigations, LLC**

540 West Madison Street, Suite 1800

Chicago, IL 60661

Telephone: 312-601-4220

Fax: (312) 332-4599

April 26, 2024

Joshua Koltun, Attorney  
One Sansome Street  
Suite 3500, No. 500  
San Francisco, CA 94104

Invoice Reference #: 851207-240418272  
Marine Taxonomic Services

Dear Mr. Koltun:

Please find attached Alvarez & Marsal's invoice for Professional Fees rendered to Marine Taxonomic Services, Ltd. in relation to the non-party subpoena related to the California Sportfishing Protection Alliance v. Pacific Bell Telephone Company's matter. This invoice covers the period 03/01/2024 through 03/31/2024. As a reminder, payment due upon receipt.

Please let me know if you have any questions regarding this invoice. We appreciate the opportunity to be of service to you.

Sincerely,

Kevin Negangard  
Managing Director

**Alvarez & Marsal Disputes and Investigations, LLC**

540 West Madison Street, Suite 1800

Chicago, IL 60661

Telephone: 312-601-4220

Fax: (312) 332-4599

April 26, 2024

**Reference Invoice #:**

851207-240418272

Joshua Koltun, Attorney  
 One Sansome Street  
 Suite 3500, No. 500  
 San Francisco, CA 94104

Marine Taxonomic Services

Professional Fees Rendered 03/01/2024 - 03/31/2024	\$	20,720.00
Admin Fee (4% of Professional Fees)	\$	828.80
Relativity User Fee - 3 Users - March 2024 (\$150/User)	\$	450.00
Secure Technology Infrastructure Fee (March 2024)	\$	1,500.00
Total Amount Due	\$	<u>23,498.80</u>

**Wire Instructions:**

Bank: Wells Fargo  
 ABA: 121000248  
 Swift: WFBUS6S  
 IBAN:  
 Account Name: Alvarez & Marsal Disputes And Investigations LLC  
 Account Number: 2000018590539  
 Reference Invoice #: 851207-240418272  
 Notification Email: treasury@alvarezandmarsal.com

**For security purposes, all bank account changes should be verbally verified by contacting A&M using a known telephone number BEFORE funds are sent to a different account.**

**Mail Instructions:**

Alvarez & Marsal Disputes and Investigations, LLC  
 Attn: Liz Carrington  
 600 Madison Avenue  
 8th Floor  
 New York, NY 10022

**Alvarez & Marsal Disputes and Investigations, LLC**

540 West Madison Street, Suite 1800

Chicago, IL 60661

Telephone: 312-601-4220

Fax: (312) 332-4599

**Reference Invoice #:**

851207-240418272

April 26, 2024

Joshua Koltun Attorney  
 One Sansome Street  
 Suite 3500, No. 500  
 San Francisco, CA 94104

## Marine Taxonomic Services

Summary of Professional Fees 03/01/2024 - 03/31/2024				
Name	Position	Hours	Rate	Fees
Negangard, Kevin	Managing Director	1.20	\$ 850.00	\$ 1,020.00
Oza, Vishal	Senior Director	2.20	\$ 675.00	\$ 1,485.00
McKenzie, Jimmy	Director	5.10	\$ 550.00	\$ 2,805.00
Stecke, Curtis	E-Discovery Manager	0.90	\$ 450.00	\$ 405.00
Michalek, Joe	Manager	25.20	\$ 450.00	\$ 11,340.00
Suri, Saira	Senior Associate	9.10	\$ 350.00	\$ 3,185.00
Nagle, Tyler	Associate	1.60	\$ 300.00	\$ 480.00
<b>Grand Total</b>		<b>45.30</b>		<b>20,720.00</b>



**Alvarez & Marsal Disputes and Investigations, LLC**  
 540 West Madison Street, Suite 1800  
 Chicago, IL 60661  
 Telephone: 312-601-4220  
 Fax: (312) 332-4599

**Reference Invoice #:**  
 851207-240418272

April 26, 2024

Joshua Koltun Attorney  
 One Sansome Street  
 Suite 3500, No. 500  
 San Francisco, CA 94104

Marine Taxonomic Services

Summary of Fees 03/01/2024 - 03/31/2024					
Date	Name	Description	Hours	Rate	Amount
3/8/2024	Michalek, Joe	Investigate inconsistent filepath naming conventions for documents collected from SharePoint. Prepare comments for Counsel discussion.	0.70	450.00	315.00
3/11/2024	Michalek, Joe	Confirm the presence and volume of text message data for specified custodian per Counsel request. Correspondence with Counsel regarding the analysis summary.	1.10	450.00	495.00
3/12/2024	Stecke, Curtis	Perform initial collection assessment and configuration for data extraction. Conduct assessment of contents to prepare for Counsel review within the review workspace.	0.30	450.00	135.00
3/12/2024	Stecke, Curtis	Perform metadata extraction of custodian data source to prepare for keyword search application and Counsel review.	0.60	450.00	270.00
3/12/2024	Michalek, Joe	Extract mobile messaging data and prepare resulting data export within review platform for Counsel review and search term analysis.	0.80	450.00	360.00
3/13/2024	McKenzie, Jimmy	Coordinate with project team to finalize mobile data in review platform for search analysis and Counsel review.	0.20	550.00	110.00
3/13/2024	Negangard, Kevin	Discussion with project team to review the revised search analysis and production initiatives.	0.40	850.00	340.00
3/13/2024	Suri, Saira	Coordinate with project team to validate the export and finalize supplemental mobile data for Counsel review.	0.50	350.00	175.00
3/13/2024	Nagle, Tyler	Prepare inventory of custodian data sources and evidence items to prepare for the metadata extraction and keyword search initiatives.	1.20	300.00	360.00
3/14/2024	Michalek, Joe	Correspondence with Counsel to confirm transfer of requested messaging data and clarify conversion process.	0.50	450.00	225.00
3/14/2024	Michalek, Joe	Teleconference with Counsel to discuss review approach for messaging data and sampling of data to determine rate of false positive search term hits.	0.60	450.00	270.00
3/14/2024	Oza, Vishal	Discussion with project team to review the revised search analysis and production initiatives.	0.70	675.00	472.50
3/14/2024	Michalek, Joe	Perform ad hoc analysis of documents in review platform to identify a random sample of documents to confirm that all term-responsive hits are false positives.	1.20	450.00	540.00
3/15/2024	McKenzie, Jimmy	Coordinate with project team to prepare document review searches at the request of Counsel and conduct received production imports. Review and finalize production imports for release to Counsel.	0.40	550.00	220.00
3/15/2024	Michalek, Joe	Finalize requested ad hoc searches for Counsel to identify candidates for a supplemental production to Opposing Counsel.	1.40	450.00	630.00
3/15/2024	Suri, Saira	Prepare third party productions from Counsel within the document review workspace for Counsel review. Development of loadfiles and generate text and images for loose files to enable Counsel review.	1.80	350.00	630.00
3/18/2024	Michalek, Joe	Prepare revised coding layout and persistent highlighting in review workspace to accurately highlight terms in documents during review.	0.30	450.00	135.00
3/18/2024	Michalek, Joe	Correspondence with Counsel to review search term highlighting in documents during review.	0.40	450.00	180.00
3/18/2024	Michalek, Joe	Prepare identification and Summary for Counsel to review based on ad hoc requests submitted to project team.	0.90	450.00	405.00
3/19/2024	Michalek, Joe	Teleconference with project team to review the document review initiatives in collaboration with Counsel and prepare response to Counsel inquiry.	0.30	450.00	135.00
3/19/2024	McKenzie, Jimmy	Teleconference with project team to review the document review initiatives in collaboration with Counsel and prepare response to Counsel inquiry.	0.30	550.00	165.00
3/19/2024	McKenzie, Jimmy	Analyze current search term setup and address Counsel inquiries to prepare review scope in anticipation for upcoming production.	0.30	550.00	165.00

Date	Name	Description	Hours	Rate	Amount
3/19/2024	Oza, Vishal	Teleconference with project team to review the document review initiatives in collaboration with Counsel.	0.30	675.00	202.50
3/19/2024	Michalek, Joe	Prepare search analysis and document category identification for Counsel to review based on ad hoc requests submitted to project team.	0.60	450.00	270.00
3/19/2024	Michalek, Joe	Discussion with Counsel to prepare revised search terms to examine results brought in due to terms containing header data.	0.80	450.00	360.00
3/20/2024	Michalek, Joe	Prepare search for Counsel to identify duplicates of unreviewed documents identified by custodians to determine if match was previously reviewed and produced.	0.40	450.00	180.00
3/20/2024	Michalek, Joe	Finalize the additional review search parameters using supplemental search terms provided by Counsel to locate documents that may be relevant and were not previously reviewed.	0.50	450.00	225.00
3/20/2024	Michalek, Joe	Prepare revised search terms and document analysis per Counsel discussion. Prepare summary of the initial findings.	0.70	450.00	315.00
3/20/2024	Suri, Saira	Coordinate with project team to prepare the initial scope for upcoming production and finalize the production validation searches.	0.90	350.00	315.00
3/20/2024	Michalek, Joe	Correspondence with Counsel to address inquiry related to the document identification and analysis requests. Prepare summary for Counsel review.	1.70	450.00	765.00
3/21/2024	Michalek, Joe	Discussion with Counsel to confirm accuracy of hyperlinks extracted in document text for data in review platform.	0.40	450.00	180.00
3/21/2024	Michalek, Joe	Perform validation of search terms and search index in review platform per Counsel request. Prepare summary of findings for Counsel review.	0.40	450.00	180.00
3/21/2024	McKenzie, Jimmy	Work with project team to continue addressing Counsel requests in development of revised review scope for upcoming production. Analyze search logic for Counsel review.	0.40	550.00	220.00
3/21/2024	Michalek, Joe	Teleconference with Counsel to address outstanding questions and develop a protocol to identify and review potentially relevant documents.	0.70	450.00	315.00
3/21/2024	Michalek, Joe	Analyze documents in review platform to identify supplemental text message conversations. Prepare summary for Counsel review.	1.10	450.00	495.00
3/22/2024	Michalek, Joe	Identification of instances where search term hits occurred in documents identified by Counsel. Prepare summary for Counsel.	0.40	450.00	180.00
3/22/2024	Michalek, Joe	Perform analysis of saved search hits to isolate documents for Counsel review and mass-tagging.	0.70	450.00	315.00
3/22/2024	Michalek, Joe	Prepare search analysis to identify documents during sweep of workspace to confirm all potentially relevant documents were reviewed for responsiveness.	1.90	450.00	855.00
3/24/2024	Michalek, Joe	Teleconference with project team to finalize production volume, summary reporting, and prepare for Counsel delivery.	0.40	450.00	180.00
3/24/2024	Michalek, Joe	Analyze documents in review workspace to identify targeted conversations for Counsel review.	0.70	450.00	315.00
3/25/2024	Michalek, Joe	Prepare search for Counsel to identify the preliminary documents for production and detail outstanding clarifications required prior to producing data.	0.30	450.00	135.00
3/25/2024	McKenzie, Jimmy	Coordinate with project team to gather information and respond to search inquiries for preparation of supplemental production volume.	0.30	550.00	165.00
3/25/2024	Michalek, Joe	Prepare revised based on comments provided by Counsel. Prepare revised summary for Counsel review.	0.90	450.00	405.00
3/25/2024	Michalek, Joe	Coordinate with Counsel to address inquiry regarding the production set. and clarifications. Finalize production population and prepare summary for Counsel confirmation.	1.10	450.00	495.00
3/25/2024	Suri, Saira	Discussion with Counsel to finalize the review initiatives and initial scoping of upcoming production. Prepare initial production summary for Counsel review..	1.30	350.00	455.00
3/26/2024	Michalek, Joe	Prepare summary for Counsel regarding the documents identified by search terms to confirm accuracy .	0.80	450.00	360.00
3/26/2024	McKenzie, Jimmy	Prepare response to Counsel inquiry in preparation for upcoming production volume. Address follow up inquiries from Counsel regarding search logic and results.	0.80	550.00	440.00
3/26/2024	Oza, Vishal	Teleconference with project team to conduct analysis across review and production populations to identify requested document review categories for Counsel.	0.80	675.00	540.00
3/26/2024	Negangard, Kevin	Prepare draft response to Counsel regarding the data preservation and search analysis approach.	0.80	850.00	680.00
3/26/2024	Michalek, Joe	Analysis of search criteria to address outstanding inquiries posed by Counsel regarding the document coding related to large document families.	0.90	450.00	405.00
3/26/2024	Michalek, Joe	Teleconference with project team to conduct analysis across review and production populations. Investigate results for addressing Counsel inquiries, and prepare summary of findings.	1.60	450.00	720.00



Date	Name	Description	Hours	Rate	Amount
3/26/2024	McKenzie, Jimmy	Teleconference with project team to conduct analysis across review and production populations. Investigate results for addressing Counsel inquiries, and prepare summary of findings.	1.60	550.00	880.00
3/27/2024	Nagle, Tyler	Perform conversion of identified file types to prepare for Counsel review.	0.40	300.00	120.00
3/27/2024	Suri, Saira	Coordinate with project team to prepare document categories for upcoming production.	0.40	350.00	140.00
3/27/2024	McKenzie, Jimmy	Teleconference with project team to finalize production volume, reporting, and prepare for Counsel delivery.	0.40	550.00	220.00
3/27/2024	McKenzie, Jimmy	Coordinate with project team to continue preparation of current production volume. Review and finalize production deliverable with team.	0.40	550.00	220.00
3/27/2024	Oza, Vishal	Teleconference with project team to finalize production volume, reporting, and prepare for Counsel delivery.	0.40	675.00	270.00
3/27/2024	Suri, Saira	Perform analysis of document coding within the review workspace to confirm production contents and prepare summary for Counsel.	0.70	350.00	245.00
3/27/2024	Suri, Saira	Export production and coordinate with project team to finalize the validation initiatives. Prepare summary and confidentiality cross reference and deliver to Counsel.	1.60	350.00	560.00
3/27/2024	Suri, Saira	Finalize the production validation searches and production set. Complete the validation of final production set for Counsel review.	1.90	350.00	665.00
				<b>Total Fees</b>	<b>20,720.00</b>

EXHIBIT E



**Alvarez & Marsal Disputes and Investigations, LLC**  
540 West Madison Street, Suite 1800  
Chicago, IL 60661  
Telephone: 312-601-4220  
Fax: (312) 332-4599

May 23, 2024

Joshua Koltun, Attorney  
One Sansome Street  
Suite 3500, No. 500  
San Francisco, CA 94104

Invoice Reference #: 851207-240520156  
Marine Taxonomic Services - Project Melrose

Dear Mr. Koltun:

Please find attached Alvarez & Marsal's invoice for Professional Fees rendered to Marine Taxonomic Services, Ltd. in relation to the non-party subpoena related to the California Sportfishing Protection Alliance v. Pacific Bell Telephone Company's matter. This invoice covers the period 04/01/2024 through 04/30/2024. As a reminder, payment due upon receipt.

Please let me know if you have any questions regarding this invoice. We appreciate the opportunity to be of service to you.

Sincerely,

Kevin Negangard  
Managing Director



**Alvarez & Marsal Disputes and Investigations, LLC**  
 540 West Madison Street, Suite 1800  
 Chicago, IL 60661  
 Telephone: 312-601-4220  
 Fax: (312) 332-4599

May 23, 2024

<b>Reference Invoice #:</b> 851207-240520156
---

Joshua Koltun, Attorney  
 One Sansome Street  
 Suite 3500, No. 500  
 San Francisco, CA 94104

Marine Taxonomic Services

Professional Fees Rendered 04/01/2024 - 04/30/2024	\$	1,505.00
Admin Fee (4% of Professional Fees)	\$	60.20
Relativity User Fee - 3 Users - April 2024 (\$150/User)	\$	450.00
Secure Technology Infrastructure Fee (April 2024)	\$	1,500.00
<b>Total Amount Due</b>	<b>\$</b>	<b>3,515.20</b>

**Wire Instructions:**

Bank: Wells Fargo  
 ABA: 121000248  
 Swift: WFBUS6S  
 IBAN:  
 Account Name: Alvarez & Marsal Disputes And Investigations LLC  
 Account Number: 2000018590539  
 Reference Invoice #: 851207-240520156  
 Notification Email: treasury@alvarezandmarsal.com

**For security purposes, all bank account changes should be verbally verified by contacting A&M using a known telephone number BEFORE funds are sent to a different account.**

**Mail Instructions:**

Alvarez & Marsal Disputes and Investigations, LLC  
 Attn: Liz Carrington  
 600 Madison Avenue  
 8th Floor  
 New York, NY 10022



Alvarez & Marsal Disputes and Investigations, LLC  
 540 West Madison Street, Suite 1800  
 Chicago, IL 60661  
 Telephone: 312-601-4220  
 Fax: (312) 332-4599

**Reference Invoice #:**  
 851207-240520156

May 23, 2024

Joshua Koltun Attorney  
 One Sansome Street  
 Suite 3500, No. 500  
 San Francisco, CA 94104

Marine Taxonomic Services

**Summary of Professional Fees 04/01/2024 - 04/30/2024**

Name	Position	Hours	Rate	Fees
McKenzie, Jimmy	Director	0.20	\$ 550.00	\$ 110.00
Michalek, Joe	Manager	3.10	\$ 450.00	\$ 1,395.00
<b>Grand Total</b>		<b>3.30</b>		<b>1,505.00</b>



**Alvarez & Marsal Disputes and Investigations, LLC**  
 540 West Madison Street, Suite 1800  
 Chicago, IL 60661  
 Telephone: 312-601-4220  
 Fax: (312) 332-4599

May 23, 2024

**Reference Invoice #:**

851207-240520156

Joshua Koltun Attorney  
 One Sansome Street  
 Suite 3500, No. 500  
 San Francisco, CA 94104

Marine Taxonomic Services

<b>Summary of Fees 04/01/2024 - 04/30/2024</b>					
<b>Date</b>	<b>Name</b>	<b>Description</b>	<b>Hours</b>	<b>Rate</b>	<b>Amount</b>
4/9/2024	McKenzie, Jimmy	Coordinate with project team to gather information for responding to Counsel inquiries regarding collection and production.	0.20	550.00	110.00
4/9/2024	Michalek, Joe	Perform validation of date filtering parameters and search terms run against custodial are consistent with Counsel's requests.	0.40	450.00	180.00
4/12/2024	Michalek, Joe	Prepare draft response to Counsel regarding the data preservation and search analysis approach.	0.80	450.00	360.00
4/17/2024	Michalek, Joe	Prepare revised search terms and document analysis per Counsel discussion. Prepare summary of the initial findings.	0.60	450.00	270.00
4/17/2024	Michalek, Joe	Prepare processing, review, and production summary requested by Counsel.	1.30	450.00	585.00
<b>Total Fees</b>					<b>1,505.00</b>

EXHIBIT F

Bill Date	Description	Dur/Qty	Billed Amt
1/7/2024	Emails with Oza and clients re document collection	0.5	275
1/9/2024	Conferences with Oza re forensic collection and technical details re Exhibit C/Relativity production; emails with Oza and Jones; conference with Rydel-Fortner re same	1.3	715
1/10/2024	Conferences with Oza and Rydel-Fortner re forensic copying; emails with Oza re declaration	1.3	715
1/11/2024	Conferences and emails with Oza re forensic collection and next steps and his declaration; emails with clients	2.7	1485
1/12/2024	Conference with Oza and emails with A&M team and clients re document search and production	1	550
1/16/2024	Conference with Oza, Suri (A&M) re document search/production	0.8	440
1/17/2024	Conference with Suri, Michalek and clients re searching documents, privilege and responsiveness review.	0.9	495
1/19/2024	Conferences with Michalek, Suri, Oza and Jones re Relativity searches	0.9	495
1/22/2024	Conference with clients A&M team	0.7	385
1/23/2024	Emails with Jones and A&M team re narrowing word search;	0.8	440
1/24/2024	Emails A&M re document production status, conference with Oza	1.2	660
1/25/2024	Emails A&M re hearing, next steps	0.3	165
1/26/2024	Conferences with; Dhillon, Kelley, Nomellini, Karis; emails with A&M, clients re doc review	2.9	1595
1/27/2024	Review ATT edits/additions to search terms; emails to clients and A&M re same and next steps re doc production	0.7	385
1/29/2024	Conferences with clients and A&M team re document collection, processing, review, production; ; analyze hit list of ATT terms vs MTS terms	3.4	1870
1/30/2024	Conferences with A&M and Clients and analyze search terms, responsiveness, ATT terms; analyze court's Stip. Protective Order re confidentiality; search JDP's SPOs in other cases	5.3	2915
1/31/2024	Conferences with A&M and client re doc collection, processing; Protective Order, emails to Kelley et al. re search terms;	5.7	3135
2/1/2024	Conferences with A&M, clients; work on doc production/processing; email to ATT counsel re SPO, review documents for privilege/confidentiality	10.4	5720
2/2/2024	Conferences with A&M and clients, document processing/review; emails with Kelley/ATT	11.6	6380
2/3/2024	Conferences and emails with A&M and clients re document production; review/process/analyze documents; email Kelley (ATT)	5.8	3190
2/4/2024	Conferences and emails with A&M and clients, document processing, production	4.8	2640
2/5/2024	Emails and conferences with clients and A&M, review and process documents	4.3	2365
2/6/2024	Emails and conferences with clients and A&M; analyze document production and potential further review; emails to Kelley (ATT)	3.6	1980
2/7/2024	Emails and conferences with clients and A&M re finalizing QCs and production; further doc review and production	4.2	2310
2/8/2024	emails and conferences with clients and A&M re production of documents and further review	4.5	2475
2/9/2024	Conferences with A&M and clients re further QC issues and supplemental production; review supplemental production;	5.7	3135
2/10/2024	Emails and conferences re supplemental production	1	550



2/11/2024	Emails and conferences re supplemental production; analyze production issues	0.7	385
2/12/2024	Emails and conferences with clients re supplemental production; analyze issues re recovery of data and production issues; resolve questions re production; draft email to Kelley/ATT re supplemental production	4.9	2695
2/16/2024	Emails with A&M; review docs for confidentiality redesignation. Analyze email from Kelley and emails with A&M re formulating response.	1.3	715
2/20/2024	Emails and conferences with A&M re analyzing data for response to ATT; review documents in Relativity re same	2.4	1320
2/21/2024	Emails and conferences A&M re response to ATT, production of docs erroneously withheld; analyze documents to respond to Kelley re questions	2.8	1540
2/22/2024	Emails with A&M re analysis of document production, further production; draft email to Kelley responding to questions about production	2.7	1485
3/13/2024	Conference with Rydel-Fortner re understanding documents in our production	0.7	385
3/14/2024	Conference and emails with Michalek re random sampling; re Mooney text messages, searching, analyze same;	0.6	330
3/18/2024	Re Kelley correspondence; analyze results from Michalek random sampling; review search results for Mooney text messages; send to production; draft response to Kelley re questions and production	3	1650
3/19/2024	Analyze and review randomized and Mooney text search results; emails Michalek and clients re same	4.2	2310
3/20/2024	Emails with Michalek and clients; analyze document searches	2.2	1210
3/21/2024	Conference with Michalek and Rydel-Fortner re searches; analyze issues in new Kelley email; review documents in searches	2.4	1320
3/23/2024	Conference with clients to understand data; review documents re same	1.5	825
3/24/2024	Conferences with Michalek and Rydel-Fortner re document review and production and "missing" text threads; emails with A&M and clients re same; review documents	2.7	1485
3/25/2024	emails, conferences with Michalek, Rydel-Fortner reviewing production v6	2.5	1375
3/26/2024	Emails re production v6 review same; draft email to Kelley re multiple queries	2.3	1265
3/29/2024	Draft email to Kelley responding to questions	0.2	110
4/8/2024	Email from Kelley, analyze and review Mooney documents and searches; email Michalek	1.1	605
4/9/2024	Conference with Mooney; draft email to Kelley	0.7	385
TOTAL		125.2	68860

EXHIBIT G

# Connecting *Changes* Everything™



**ITEM 8. FINANCIAL STATEMENTS AND SUPPLEMENTARY DATA****Consolidated Statements of Income**

	2023	2022	2021
<b>Operating Revenues</b>			
Service	\$ 99,649	\$ 97,831	\$ 111,565
Equipment	22,779	22,910	22,473
Total operating revenues	122,428	120,741	134,038
<b>Operating Expenses</b>			
Cost of revenues			
Equipment	23,136	24,009	23,685
Broadcast, programming and operations	—	—	8,106
Other cost of revenues (exclusive of depreciation and amortization shown separately below)	26,987	26,839	28,616
Selling, general and administrative	28,874	28,961	29,669
Asset impairments and abandonments and restructuring	1,193	27,498	213
Depreciation and amortization	18,777	18,021	17,852
Total operating expenses	98,967	125,328	108,141
<b>Operating Income (Loss)</b>	23,461	(4,587)	25,897
<b>Other Income (Expense)</b>			
Interest expense	(6,704)	(6,108)	(6,716)
Equity in net income of affiliates	1,675	1,791	603
Other income (expense) – net	1,416	5,810	9,387
Total other income (expense)	(3,613)	1,493	3,274
<b>Income (Loss) from Continuing Operations Before Income Taxes</b>	19,848	(3,094)	29,171
Income tax expense on continuing operations	4,225	3,780	5,395
<b>Income (Loss) from Continuing Operations</b>	15,623	(6,874)	23,776
Loss from discontinued operations, net of tax	—	(181)	(2,297)
<b>Net Income (Loss)</b>	15,623	(7,055)	21,479
<b>Less: Net Income Attributable to Noncontrolling Interest</b>	(1,223)	(1,469)	(1,398)
<b>Net Income (Loss) Attributable to AT&amp;T</b>	\$ 14,400	\$ (8,524)	\$ 20,081
<b>Less: Preferred Stock Dividends</b>	(208)	(203)	(207)
<b>Net Income (Loss) Attributable to Common Stock</b>	\$ 14,192	\$ (8,727)	\$ 19,874
Basic Earnings (Loss) Per Share from continuing operations	\$ 1.97	\$ (1.10)	\$ 3.07
Basic Loss Per Share from discontinued operations	\$ —	\$ (0.03)	\$ (0.30)
<b>Basic Earnings (Loss) Per Share Attributable to Common Stock</b>	\$ 1.97	\$ (1.13)	\$ 2.77
Diluted Earnings (Loss) Per Share from continuing operations	\$ 1.97	\$ (1.10)	\$ 3.02
Diluted Loss Per Share from discontinued operations	\$ —	\$ (0.03)	\$ (0.29)
<b>Diluted Earnings (Loss) Per Share Attributable to Common Stock</b>	\$ 1.97	\$ (1.13)	\$ 2.73

The accompanying notes are an integral part of the consolidated financial statements.

**Consolidated Statements of Comprehensive Income**

	2023	2022	2021
Net income (loss)	\$ 15,623	\$ (7,055)	\$ 21,479
Other comprehensive income (loss), net of tax:			
Foreign Currency:			
Translation adjustment (includes \$0, \$0 and \$(2) attributable to noncontrolling interest), net of taxes of \$143, \$90 and \$(44)	463	346	(127)
Reclassification adjustment included in net income (loss), net of taxes of \$0, \$0 and \$204	—	—	2,087
Distributions of WarnerMedia, net of taxes of \$0, \$(38) and \$0	—	(182)	—
Securities:			
Net unrealized gains (losses), net of taxes of \$8, \$(49) and \$(21)	22	(143)	(63)
Reclassification adjustment included in net income (loss), net of taxes of \$4, \$3 and \$(1)	11	8	(3)
Derivative Instruments:			
Net unrealized gains (losses), net of taxes of \$228, \$(183) and \$(192)	922	(648)	(715)
Reclassification adjustment included in net income (loss), net of taxes of \$12, \$25 and \$19	47	96	72
Distributions of WarnerMedia, net of taxes of \$0, \$(12) and \$0	—	(24)	—
Defined benefit postretirement plans:			
Net prior service (cost) credit arising during period, net of taxes of \$10, \$583 and \$(8)	32	1,787	(34)
Amortization of net prior service credit included in net income (loss), net of taxes of \$(642), \$(663) and \$(660)	(1,963)	(2,028)	(2,020)
Distributions of WarnerMedia, net of taxes of \$0, \$5 and \$0	—	25	—
Other comprehensive income (loss)	(466)	(763)	(803)
Total comprehensive income (loss)	15,157	(7,818)	20,676
Less: Total comprehensive income attributable to noncontrolling interest	(1,223)	(1,469)	(1,396)
<b>Total Comprehensive Income (Loss) Attributable to AT&amp;T</b>	<b>\$ 13,934</b>	<b>\$ (9,287)</b>	<b>\$ 19,280</b>

The accompanying notes are an integral part of the consolidated financial statements.

EXHIBIT H



Bill Date	Description	Total D Gross	
3/28/2024	Draft email to Kelley re cost-sharing	0.8	440
5/5/2024	Analyze cost shifting email/memo from Kelley, legal research re same	1.8	990
5/6/2024	Legal research re ATT contentions on cost-shifting;	2.5	1375
7/16/2024	Legal research and draft brief re cost-shifting	3.6	1980
7/23/2024	Draft and edit cost-shifting brief	0.8	440
9/24/2024	Analyze ATT exhibits to consent decree re Cost-Shifting arguments and compliance with confidentiality	2.6	1430
10/1/2024	File informal brief and analyze ATT brief; legal research re same and prepare for hearing and future motion practice	1.7	935
10/2/2024	Review documents cited in ATT brief and related documents re factual arguments; emails Jones re facts	0.9	495
10/3/2024	Attend informal hearing re cost shifting; conferences re same; analyze Kelley email re meet confer and draft response	1	550
10/15/2024	Outline Cost-shifting motion, legal research re same	3.2	1760
10/16/2024	Legal research re cost-shifting	2.9	1595
10/18/2024	Legal research re cost-shifting; emails with Jones re factual information; draft motion	3.1	1705
10/23/2024	Legal research re AT&T contentions and authority	2.6	1430
10/25/2024	Cost shifting brief; research re procedural posture and facts, emails with Jones re same; draft sections of cost-shifting brief	3.2	1760
11/1/2024	Draft MPA re cost-shifting	2.5	1375
11/4/2024	Edit Cost Shifting Motion, draft declarations and related papers, emails with declarants	2.1	1155
11/5/2024	Edit MPA re cost-shifting	1.8	990
11/6/2024	Draft motion and related papers; edit MPA re cost shifting; citechecking and finalizing papers to be filed	3.2	1760
	TOTAL	40.3	22165

EXHIBIT I



NAVI DHILLON (SBN 279537)  
navidhillon@paulhastings.com  
PETER C. MEIER (SBN 179019)  
petermeier@paulhastings.com  
CHRISTOPHER J. CARR (SBN 184076)  
chris carr@paulhastings.com  
LUCAS GRUNBAUM (SBN 314180)  
lucasbrunbaum@paulhastings.com  
PAUL HASTINGS LLP  
101 California Street, 48th Floor  
San Francisco, California 94111  
Telephone: (415) 856-7000

HARIKLIA KARIS (*pro hac vice forthcoming*)  
hkaris@kirkland.com  
ROBERT B. ELLIS (*pro hac vice forthcoming*)  
rellis@kirkland.com  
VANESSA BARSANTI (SBN 292103)  
vanessa.barsanti@kirkland.com  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654  
Telephone: (312) 862-2000

Attorneys for Movant  
PACIFIC BELL TELEPHONE COMPANY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

PACIFIC BELL TELEPHONE  
COMPANY,

Movant,

v.

MARINE TAXONOMIC SERVICES  
LTD.,

Respondent.

CASE NO. 3:23-cv-1747-DMS-KSC

**UPDATE CONCERNING MEET  
AND CONFER EFFORTS AND  
THE COURT'S OCTOBER 26  
ORDER**

Underlying Litigation:  
2:21-cv-00073-MCE-JDP  
United States District Court  
Eastern District of California

1           **A.     Update Concerning the Parties’ Meet and Confer Efforts.**

2           On September 21, 2023, this Court issued an Order (Dkt. 6) in response to  
3 Pacific Bell Telephone Company’s (“Pacific Bell”) original motion to enforce the  
4 subpoena against Marine Taxonomic Services, Ltd. (“MTS”) (Dkt. 1), including a  
5 requirement that the parties confer about “whether Pacific Bell’s Motion should be  
6 transferred to the U.S. District Court Eastern District of California. *See* Fed. R. Civ. P.  
7 45(f).” Dkt. 6, at 1–2. The parties were initially unable to accomplish this because  
8 MTS was non-responsive. *See* Dkt. 8-7, at 4–8. MTS indicated on September 10,  
9 2023 that it was retaining counsel, Dkt. 5-3, at 3–4, but as of yesterday it had not done  
10 so.

11           Today, however, a lawyer named Alexander Papachristou emailed the  
12 following update to counsel for Pacific Bell:

13           We secured pro bono counsel who then mysteriously withdrew. I am  
14 back on the hunt for other counsel. In the meantime, ***I am considering***  
15 ***how BtB and MTS can respond to the subpoena and your***  
16 ***communications***, at least in the interim. I ask that you give me a few  
17 days to figure that out. I hope that you will desist from serving process  
18 and corresponding with Seth and Monique. They are taking this  
matter seriously and responsibly and trying to find a way to respond  
appropriately. They certainly need legal representation. I am  
determined to find that for them.

19 Kelley Decl., ¶ 7, Ex. A (emphasis added).<sup>1</sup>

20           Based on today’s statement from Mr. Papachristou, Pacific Bell respectfully  
21 requests that the Court provide the parties with two additional weeks to meet and  
22 confer, at which time Pacific Bell will provide an update, including as to the Court’s  
23 question about “whether Pacific Bell’s Motion should be transferred to the U.S.  
24 District Court Eastern District of California,” as the Court requested on September 21,  
25 2023 (Dkt. 6). Pacific Bell also welcomes a telephonic conference with the Court to  
26 the extent such a conference would assist in considering or clarifying the

27 <sup>1</sup> Further background concerning Mr. Papachristou’s correspondence with counsel for Pacific Bell  
28 and his attempts to secure counsel is provided in the attached Declaration of Jon David Kelley.

1 issues. Pacific Bell of course defers to the Court on the need for a conference and in  
2 terms of scheduling.

3 **B. Proof of Service.**

4 Pursuant to the Court's October 26 Order (Dkt. 11), Pacific Bell concurrently  
5 filed today the proof of service of the MTS document subpoena, which was originally  
6 served on August 10, 2023. Dkt. 12.

7 This Proof of Service was originally attached to the Declaration of Navi Singh  
8 Dhillon in support of Pacific Bell's Motion to compel MTS's compliance with the  
9 subpoena, submitted on the same day as the Motion (September 21, 2023), *see* Dkt. 5-  
10 4, at 2, and Pacific Bell apologizes for any confusion associated with this original  
11 filing.

12  
13 DATED: November 3, 2023

Respectfully submitted,

14  
15 KIRKLAND & ELLIS LLP

/s/ Vanessa Barsanti

16 Attorney for Movant Pacific Bell Telephone  
17 Company

18 Email: [vanessa.barsanti@kirkland.com](mailto:vanessa.barsanti@kirkland.com)  
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NAVI DHILLON (SBN 279537)  
navidhillon@paulhastings.com  
PETER C. MEIER (SBN 179019)  
petermeier@paulhastings.com  
CHRISTOPHER J. CARR (SBN 184076)  
chris carr@paulhastings.com  
LUCAS GRUNBAUM (SBN 314180)  
lucasbrunbaum@paulhastings.com  
PAUL HASTINGS LLP  
101 California Street, 48th Floor  
San Francisco, California 94111  
Telephone: (415) 856-7000

HARIKLIA KARIS (*pro hac vice forthcoming*)  
hkarris@kirkland.com  
ROBERT B. ELLIS (*pro hac vice forthcoming*)  
rellis@kirkland.com  
VANESSA BARSANTI (SBN 292103)  
vanessa.barsanti@kirkland.com  
KIRKLAND & ELLIS LLP  
300 North LaSalle  
Chicago, IL 60654  
Telephone: (312) 862-2000

Attorneys for Movant  
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UNITED STATES DISTRICT COURT  
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PACIFIC BELL TELEPHONE  
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MARINE TAXONOMIC SERVICES  
LTD.,

Respondent.

CASE NO. 3:23-cv-1747-DMS-KSC

**DECLARATION OF JON DAVID  
KELLEY IN SUPPORT OF  
PACIFIC BELL'S UPDATE  
CONCERNING MEET AND  
CONFER EFFORTS AND THE  
COURT'S OCTOBER 26 ORDER**

Underlying Litigation:  
2:21-cv-00073-MCE-JDP  
United States District Court  
Eastern District of California

1 I, Jon David Kelley, hereby declare as follows:

2 1. I am a partner at the law firm of Kirkland & Ellis LLP and counsel for  
3 Movant Pacific Bell Telephone Company (Pacific Bell) in the above-captioned  
4 litigation. I submit this declaration in support of Pacific Bell's Update Concerning Meet  
5 and Confer Efforts and the Court's October 26 Order. I have personal knowledge of  
6 the facts set forth herein and, if called as a witness, I could and would testify  
7 competently thereto.

8 2. On September 10, 2023, Seth Jones contacted counsel for Pacific Bell via  
9 email and stated that a lawyer named Alexander Papachristou was "trying to get us legal  
10 representation," but was "not able to represent us," himself.

11 3. On September 11, 2023, Mr. Papachristou contacted counsel for Pacific  
12 Bell and represented he was looking for counsel for Jones and Marine Taxonomic  
13 Services.

14 4. On September 18, 2023, Mr. Papachristou contacted counsel for Pacific  
15 Bell and indicated he had located counsel to represent Marine Taxonomic Services,  
16 Ltd., and Jones. Counsel for Pacific Bell responded and requested that Mr. Papachristou  
17 "provide us immediately with [their] contact information." Mr. Papachristou did not  
18 respond.

19 5. On October 26, 2023, Mr. Papachristou contacted counsel for Pacific Bell  
20 and indicated he was still trying to "secure counsel" for Jones and Marine Taxonomic  
21 Services, Ltd.

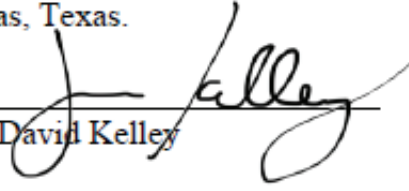
22 6. I spoke with Mr. Papachristou over the phone on October 27. During that  
23 call, Mr. Papachristou indicated that he expected to obtain counsel for Jones and Marine  
24 Taxonomic Services, Ltd. "within a few days," and asked that Pacific Bell stop serving  
25 additional motion papers at the homes of Jones and Monique Fortner, because it was  
26 "unnecessary."  
27  
28

1           7. Attached as Exhibit A is a true copy of an email sent to me by Alexander  
2 Papachristou on November 3. Mr. Papachristou's email states, in pertinent part, the  
3 following:

4           "We secured pro bono counsel who then mysteriously withdrew. I am  
5 back on the hunt for other counsel. In the meantime, I am considering how  
6 BtB and MTS can respond to the subpoena and your communications, at  
7 least in the interim. I ask that you give me a few days to figure that out. I  
8 hope that you will desist from serving process and corresponding with Seth  
9 and Monique. They are taking this matter seriously and responsibly and  
10 trying to find a way to respond appropriately. They certainly need legal  
11 representation. I am determined to find that for them." Ex. A.

12           I declare under penalty of perjury under the laws of the United States that the  
13 foregoing is true and correct.

14           Executed November 3, 2023 in Dallas, Texas.

15           By:   
16 Jon David Kelley

# **EXHIBIT A**

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**From:** Alexander Papachristou <[APAPACHRISTOU@nycbar.org](mailto:APAPACHRISTOU@nycbar.org)>  
**Sent:** Friday, November 3, 2023 1:23 PM  
**To:** Kelley, Jon David <[jon.kelley@kirkland.com](mailto:jon.kelley@kirkland.com)>  
**Subject:** Your client Pacific Bell

Jon,

We secured pro bono counsel who then mysteriously withdrew. I am back on the hunt for other counsel. In the meantime, I am considering how BtB and MTS can respond to the subpoena and your communications, at least in the interim. I ask that you give me a few days to figure that out. I hope that you will desist from serving process and corresponding with Seth and Monique. They are taking this matter seriously and responsibly and trying to find a way to respond appropriately. They certainly need legal representation. I am determined to find that for them.

Thanks,

Alex



Alexander Papachristou  
Executive Director, Cyrus R. Vance Center for International Justice  
212.382.6689 | 42 West 44<sup>th</sup> Street, New York, NY 10036  
[apapachristou@nycbar.org](mailto:apapachristou@nycbar.org) | [www.vancecenter.org](http://www.vancecenter.org)